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This handbook serves as program guidance to EPA Regional Offices and states for conducting community relations activities in the Superfund program. The Superfund community relations program encourages two-way communication between communities affected by releases of hazardous substances and agencies responsible for cleanup actions. The program attempts to provide communities with accurate information about problems posed by releases of hazardous substances; at the same time, it gives local officials and citizens the opportunity to comment on and provide input to technical solutions to site problems.

The handbook presents guidelines for developing community relations programs for removal actions and remedial actions. It discusses the advantages and disadvantages of various activities that may be included in a community relations program. The handbook explains the administrative requirements for the program. Guidance on managing community relations activities during enforcement actions will be added to the handbook at a later date. Appendix A discusses how to draft community relations plans and presents examples of community relations plans for removal and remedial actions. Appendix B provides guidance on how to conduct on-site discussions with local officials and citizens and on how to assess community concerns on the basis of these discussions.

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COMMUNITY RELATIONS IN SUPERFUND

A HANDBOOK

United States Environmental Protection Agency
Office of Emergency and Remedial Response

September 1983 Interim Version

NOTE

This handbook was prepared by ICF Incorporated for the Office of Emergency and Remedial Response, U.S. Environmental Protection Agency (EPA), under EPA contract 68-02-3669. It was revised and approved through the EPA Peer and Administrative Review Control System. Peer reviewers were Anthony Diecidue, L. Michael Flaherty, Inez Artico, Marcia Carlson, and Richard Hoffman.

This handbook serves as program guidance for conducting community relations activities in the Superfund program. It incorporates EPA policy on community relations that is not expected to change, although details of the handbook may be modified in the future to reflect experience with a developing program. Questions and comments concerning this handbook should be addressed to Daphne Gemmill, U.S. Environmental Protection Agency, 401 M Street, S.W., Office of Emergency and Remedial Response (WH-548D), Washington, D.C. 20460.

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INTRODUCTION

The Superfund* community relations program encourages two-way communication between communities affected by releases of hazardous substances and agencies responsible for cleanup actions. The program attempts to provide communities with accurate information about problems posed by releases of hazardous substances; at the same time, it gives local officials and citizens the opportunity to comment on and provide input to technical solutions to site problems. An effective community relations program must be an integral part of every Superfund action.

Hazardous waste sites and other releases of hazardous substances have the potential to create strong public concern about government action. The health and environmental problems stemming from releases of hazardous substances are inherently sensitive.

A community relations program can enable government staff to take community concerns into account in planning a response and the result can be a better response action. At the same time, it can ensure that citizens have accurate information about the response. It is consequently an essential component of a successful Superfund response action.

This handbook offers specific guidance for EPA and state staff on how to design and implement an effective community relations program. The handbook presents guidelines for developing community relations programs for removal actions (Chapter 2) and remedial actions (Chapter 3). Chapter 4 discusses the advantages and disadvantages of various activities that may be included in a community relations program. The handbook explains the administrative requirements for the program (Chapter 5). Chapter 6, which provides guidance on managing community relations activities during enforcement actions, will be added to the handbook at a later date. Appendix A discusses how to draft community relations plans and presents examples of community relations plans for removal and remedial actions. Appendix B provides guidance on how to conduct on-site discussions with local officials and citizens and on how to assess community concerns on the basis of these discussions. A community relations program quarterly report format is contained in Appendix C. Appendix D lists the EPA Headquarters and Regional Office staffs responsible for community relations program management and implementation. At a later date, after the completion of a community relations training program, an Appendix E will be added to the handbook. This appendix will illustrate how community relations staff should deal with typical communications problems. Appendix F presents brief descriptions of terms and acronyms used in the handbook.

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*Superfund is the $1.6 billion fund created by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for responding to releases or threats of releases of hazardous substances. This handbook also uses the term "Superfund" to describe the response program established by the Environmental Protection Agency under CERCLA's authority.

Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) requires response personnel to "be sensitive to local community concerns (in accordance with applicable guidance)" (40 CFR 300.61(c)(3)). This handbook serves as the referenced applicable guidance. Under Section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), response actions shall "to the greatest extent possible" be in accordance with the NCP. That provision is applicable to this handbook as well.

CHAPTER 1

AN EFFECTIVE COMMUNITY RELATIONS PROGRAM

This chapter describes the background and objectives of the Superfund community relations program. First, it defines the program and describes how EPA derived the guidelines presented in this handbook. It then explains how the program can enhance the ability of EPA and the states to implement cost-effective removal and remedial actions.

A. PROGRAM DEFINITION

The Superfund community relations program is a site-specific information and communications program that must be an integral part of every Superfund-financed remedial or removal action. ,When EPA (or a state under a cooperative agreement with EPA) decides to fund a Superfund response action lasting longer than a few days, it must develop a community relations plan (CRP) that details:

- How citizen concern will be identified and assessed at the site;
- How accurate information on problems associated with the release of hazardous substances will be distributed and explained to the community;
- How citizens will have an opportunity to comment on and provide input to ongoing and proposed site work; and
- How the technical alternatives and the proposed technical solution will be explained to the community.

Specific activities listed in the CRP for soliciting citizen input and distributing information vary from site to site, depending upon the level of citizen concern and the nature of the site's technical problems. The responsible agency (either EPA or the state) implements the plan, in close coordination with other interested agencies.

All site-specific activities that encourage communication between communities affected by releases of hazardous substances and agencies responsible for cleanup together constitute EPA's Superfund community relations program. The program's evolution and objectives are described below.

B. PROGRAM BACKGROUND

The guidelines in this handbook are based upon on-scene investigations of government response to hazardous substance problems in twenty-one communities across the country. An EPA project team interviewed Regional EPA staff, On-Scene Coordinators (OSCs), officials in state agencies, local officials, citizens, and environmentalists to find out how citizens have responded to releases of hazardous substances and to evaluate their needs and concerns. From these investigations, EPA learned which community involvement techniques have been effective at these twenty-one sites and deserve to be adopted in the Superfund community relations program -- and which activities should be avoided. The findings of EPA's investigations of citizen involvement in past hazardous substance incidents have significant implications for the Superfund community relations program.

First, **the people who have the greatest concerns about a site or release incident are usually those individuals directly affected by the health or environmental problem or who believe their health is endangered**. For this reason, eliciting citizen input from local chapters of national environmental organizations can be important, but may not provide a sufficient or accurate representation of the views and concerns of those citizens affected by the problem. The community relations effort must be directed primarily at the people most directly affected by site problems.

Second, **the best way to reach concerned citizens is usually through small informal efforts that are conducted early in the response action and are held periodically during the response action**: informal living room briefings, personal contact with an OSC, workshops, and citizen group meetings. When public meetings are needed, they must be planned and conducted with great care to prevent them from becoming counterproductive confrontations.

Third, **both technical problems and the level of citizen concern vary greatly from site to site. Therefore, there can be no set formulas for a community relations program**. Community relations efforts must be tailored to the distinctive needs of each community and must be tied to the technical response schedule. Where releases seriously threaten public health or where the threat to public health increases during a response action, community relations staff must have the flexibility to address citizen concerns, without being tied down to formalized procedures.

Finally, where possible, **a community relations program should carefully identify controversial issues**. The program staff should elicit citizens' concerns about emotional, sensitive, or difficult issues from the beginning of a response action.

C. COMMUNITY RELATIONS AND AN EFFECTIVE SUPERFUND PROGRAM

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted by Congress to provide broad federal authority and funds for responding to releases or threatened releases of hazardous substances, pollutants, or contaminants from vessels or facilities. Although the $1.6 billion response fund (Superfund) created by CERCLA seems large, the cost of responding to releases is also large and there are many problems in need of attention. Thus, for remedial actions, the National Contingency Plan requires the lead agency for any site action to choose the most cost-effective remedial alternative to address the site's problems. It may be necessary, therefore, to explain to a community that a balance must be struck between the need to protect public health, welfare, and the environment at any one site, and the need to conserve the Fund for responding to problems at other sites.

A successful community relations program is a preventive effort. EPA has found that a measure of prevention is critical to implementing a cleanup of a hazardous substance release. **Every site action has the potential to become difficult to manage if communication is poor between EPA or the state government, local governments, interest groups, and citizens**. People who are worried about releases of hazardous substances and believe that the government has not considered their concerns may press for additional -- and more costly -- relief. Regardless of the technical adequacy of a proposed response, it may prove unacceptable to the local public. **The best way to lessen the chance that citizens might reject a cost-effective solution is to identify citizen concerns, take these concerns into consideration when fashioning a solution, and explain the rationale behind the course of action chosen.**

The community relations guidelines outlined in this handbook should enhance EPA's and states' abilities to implement cost-effective removal and remedial actions in communities across the nation. A community relations program can ensure that the concerns and questions of citizens are not neglected, but are incorporated into the decisionmaking process. It can lessen the chances for the spread of rumors or misconceptions about the nature of the threat at the site.

The objectives of the Superfund community relations program, consequently, are as follows:

- **Gather information about the community in which a site is located**. A community relations program provides a vehicle for exchanges between EPA, the state, the public, and local government. It enables EPA and state staff to identify citizen leaders, public concerns, and a site's social and political history. Sometimes it can also yield technical data useful in planning a solution to the site's problems -- or information useful in an enforcement case against a responsible party.

- **Inform the public of planned or ongoing actions**. The program should inform the public of the nature of the environmental problem, the remedies under consideration, and the progress already made.

- **Give citizens the opportunity to comment on and provide input to technical site decisions**. The program should enable citizens to understand and comment on decisions that will have long-term effects on their community.
- **Focus and resolve conflict**. Conflict may be unavoidable in some circumstances, but it can be constructive if it brings into the open alternative viewpoints based upon solid reasons for criticism or dissent. An effective community relations program channels conflict into a forum where it can serve a useful purpose. When such opposition has already arisen, a concerted attempt to communicate with and involve all parties can help reduce tension.

This handbook presents techniques that can aid EPA and state staff in achieving these objectives.

D. A WORD ON INNOVATION

The problems at every Superfund site are different. Therefore, those individuals charged with conducting a community relations program must exercise a great deal of creativity and flexibility, and decide which measures are appropriate for the particular removal or remedial action. **The best advice this handbook can provide is to tailor each community relations plan to the needs of a given incident, taking into account the social and political context and the history of public involvement in the problem.**

E. AUDIENCE

This handbook is directed primarily at EPA and state technical staff, because no community relations program can be successful without their leadership, cooperation, support, and participation on a daily basis. Furthermore, the handbook assumes that readers have a working knowledge of the Superfund statutory requirements, guidance outlined in the National Contingency Plan, and current program policies. Readers requiring more detailed Superfund program information should consult the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the National Oil and Hazardous Substances Pollution Contingency Plan, and EPA guidance manuals on enforcement, cooperative agreements, and other program policies.

The handbook does not serve as a public participation manual. In the past, several public participation manuals have been prepared for EPA, particularly in the water program. Readers that need detailed guidance on public participation techniques (e.g., how to organize, publicize, and conduct meetings) should consult these manuals.

CHAPTER 2

COMMUNITY RELATIONS DURING IMMEDIATE AND PLANNED REMOVALS

This chapter provides a brief guide to the kinds of community relations activities that can be undertaken during immediate and planned removals. Whether the technical problems encountered during a removal action are simple or complex, the social, political, economic, and psychological effects of the action on the community can be dramatic. Citizens will want information about the effects of exposure to hazardous substances upon their health and environment. In addition, citizens must be given the opportunity to express opinions and concerns about a removal action in their community. Finally, citizens should be informed about the restrictions CERCLA and the National Contingency Plan place on removal actions.

The purposes of the communications techniques discussed in this chapter are to: (1) help EPA identify and assess citizens' perceptions of the health and environmental threat; (2) give citizens an opportunity to comment on and provide input to the selection of a response action, when feasible; and (3) help community relations staff choose effective methods for distributing and explaining information on removal actions. Readers should consult Chapter 4 for detailed explanations of the techniques suggested in this chapter. Chapter 5 describes community relations planning requirements for removal actions, and Appendix A provides formats for planning documents.

A. IMMEDIATE REMOVAL ACTIONS

1. Need for Communication

EPA may decide to undertake an immediate removal action in those situations where immediate action will prevent or mitigate immediate and significant risk of harm to human life or health or to the environment. (See Section 300.65 of the National Contingency Plan for a definition of immediate removal actions.) The On-Scene Coordinator's (OSC's) principal responsibility in an immediate removal is to protect public health and property until the emergency is abated. During such an incident, the primary community relations activity is to inform the community about response actions and their effects on the community.

The specific types of community relations activities during immediate removals are likely to include responding to inquiries from the media, providing local officials with the knowledge necessary to handle the questions of their constituents, and giving information directly to concerned citizens. By channeling community inquiries to the appropriate agency or official, the community relations program can ensure that the community receives the vital information it needs about the effects of the release on the community's health and safety and the government's response action. At the same time, the program can prevent the OSC from being deluged with questions about the operation from reporters, local officials, or citizens, diverting attention from necessary response actions.

2. Planning for Community Relations during Immediate Removals

Planning for community relations during immediate removals entails:

- Obtaining background information on the community affected by the release of hazardous substances and the possible effects of the release;
- Developing a community relations program that meets the special needs of the community; and
- Establishing a working relationship between the technical staff and Regional Office of Public Affairs (OPA).

Some releases of hazardous substances require a short term immediate removal action lasting no longer than a few days. These kinds of actions would generally not involve substantial community relations planning because of the nature of the emergency. In other cases, however, the immediate removal may require longer term action and may generate considerable public interest and need for information. **For actions that may last longer than 5 days, a community relations profile -- a short form community relations plan (CRP) -- must be prepared. If an action is anticipated to last longer than 45 days, a CRP must be prepared.**

The community relations profile explains how community relations staff intend to plan for and implement community relations activities at the site. As detailed in Chapter 5, the profile is submitted as part of the Immediate Removal Request (10 Point Document). It should contain a brief outline of the nature of community concern, the key site issues, the objectives of community relations activities, and the communications activities considered for the site.

The immediate removal CRP should be prepared as soon as it is known that the response action may last longer than 45 days. The plan should succinctly state the site background, the nature of the community concern, the key site issues, the objectives of the community relations activities, and specific activities to be undertaken at the site. The CRP should be submitted as soon as possible after the approval of the Immediate Removal Request.

Appendix A contains a detailed list of the information that must be gathered and included in an immediate removal profile and plan, and profile and plan formats that can be used as guides. Some communications activities that may be conducted during immediate removals are detailed below.

3. Suggested Community Relations Activities

Community relations programs for immediate removals should take into consideration that the immediate removal may be only the beginning of a lengthy presence in the community. It is possible that a planned removal or remedial action will follow at a site. Thus, the OSC's actions during an immediate removal may have long-term consequences for EPA or state effectiveness during future operations at the site.

To ensure that the community is given accurate information in a timely and efficient way during an immediate removal, OSCs and Regional OPA staff should work with other Superfund program and state staff to:

- Designate a single contact to handle all public inquiries.
- Provide sufficient telephone lines and staff to support the designated public contact and publicize the phone number in the local media.
- Contact immediately local officials, the Governor's Office, and interested Congressional officials; provide these officials with information about the release and the immediate removal action.
- If sufficient interest exists, hold a news conference or briefing to explain problems caused by the release and the plans for the immediate removal action. Also, establish a repository for site information at a local library, health office, or community center with approved technical reports, official phone numbers, and the immediate removal CRP.
- If sufficient time exists, periodically hold small meetings with local officials and groups of interested citizens as early in the response action as possible.

There will be times when an immediate removal is taken at a site that has long been a recognized problem and that is familiar to community relations staff. For example, an immediate removal can be preceded by an assessment period, or it can be taken midway through a remedial action. In such cases, some of the preparatory work for a community relations program may already have been accomplished. Local officials and citizens will be aware of the need for action and may have a good idea of what to expect when work begins at the site. Similarly, community relations staff may be well acquainted with the special concerns of people living near the site. In these cases, the community relations program can concentrate on public consultations and briefings and news conference updates.

When the threat to human health or the environment is especially acute, the activities noted above may be effectively implemented through the establishment of an on-scene information office. The office may consist of a person stationed full-time at a trailer on the site to respond to inquiries and to prepare fact sheets or news releases. Whenever dealings with the public or the media appear likely to prevent the OSC from giving adequate attention to the technical aspects of the response, an on-scene information office should be established. In cases where Regional Office or state resources may not be sufficient to staff such an on-scene office, a local information repository can provide a useful vehicle for distributing information.

B. PLANNED REMOVAL ACTIONS

Planned removals are either continuations of immediate removals or cleanup actions, limited in time and cost, that are taken at unranked sites. (See the National Contingency Plan, Section 300.67 for planned removal definition.) As with immediate removals, planned removals may lead to a remedial action and a lengthy EPA or state presence at the site. Community planning, therefore, should account for this possibility.

Community relations staff must design a community relations program and prepare a CRP for each planned removal. As explained in Chapter 5, the CRP must be submitted along with the "14 point" contractual document. The Action Memorandum should state that the CRP has been prepared and should briefly summarize major citizen concerns.

Based upon EPA's investigations at twenty-one hazardous waste sites, the following guidelines are suggested for designing and implementing a community relations program for planned removals. (See Chapter 4 for a more detailed explanation of some of the community relations techniques referred to in these guidelines.)

1. Hold on-site discussions with local officials and citizens.

Prior to preparing a CRP, community relations staff must meet with local officials and interested citizens to obtain information about the site and to identify public concerns. This information should be incorporated in the CRP and passed on to technical and enforcement staff where relevant. (Appendix B contains guidance on how to conduct on-site discussions.)

In addition, community relations staff can use these initial discussions to explain the limited nature of a planned removal. Although some planned removals will not require follow-up actions, others may not result in permanent solutions to the problems associated with the release of hazardous substances. Instead, they may require EPA or the state to leave a community with a temporary remedy and an indefinite delay before further work, if any, can begin. Local officials and citizens are likely to assume, however, that the purpose of the action is to provide a permanent remedy to the problem, one that will involve the removal of all hazardous substances from the site. If they are allowed to generate such expectations, they will be frustrated if the planned removal is only a provisional response. At an early stage, therefore, it is critical to prevent the development of unrealistic expectations. Early on-site discussions can be a key factor in developing accurate expectations.

2. Assess the nature of citizen concern.

After completing the on-site discussions, community relations staff must assess the nature and level of citizen concern at the site. Such an assessment allows staff to match communications activities both to the technical schedule of the response action and to citizens' information needs and concerns. One method of assessing citizen concern is detailed in Chapter 4 and explained further in Appendix B.

3. Describe citizen concerns, community relations activities, timing, and resource needs in a CRP.

In addition to a thorough assessment of citizen concerns, the CRP must include: a description of specific objectives for the program; a list of all communications activities planned for the site; a detailed workplan and budget; a staffing plan; a schedule of activities; a list of interested citizens; and a list of technical and community relations staff responsible for the site.

Chapter 4 describes a number of communications techniques that can be used in a community relations program at a planned removal or remedial action site. Given the limited nature of a planned removal, however, many of these techniques may not be needed or appropriate. Community relations staff should use discretion in determining which activities would be effective at a particular site. In general, the following activities are suggested for a planned removal:

- **Briefings for local officials and the media.** Briefings on the planned removal action are essential at an early point in the action. They are useful for providing information about any health or environmental problems posed by the site and for informing the public about the proposed response action.

- **Public meetings and workshops.** In general, meetings and workshops should be small and informal. They should be held as early in the response action as possible, and should be used both to identify citizen concerns and to solicit citizen comments on the response action. Investigations of community involvement at sites in every EPA Region suggest that small meetings and workshops are very effective for providing information and identifying citizen concerns. Conversely, these investigations also show that large meetings or formal public hearings do not aid officials in identifying citizen concerns and do not allow officials to explain effectively their findings and proposed actions. In certain situations, however, a large public meeting or a formal hearing may be warranted. When this is the case, it is advisable to hold smaller meetings with interested citizens in advance, and to organize the public meeting under the auspices of an existing organization, such as the town council or the League of Women Voters.

- **Site tours**. Site tours for local officials, members of the media, and small groups of active citizens enable community relations staff to explain in detail the problems at the site and the proposed solution.
- **News releases**. News releases are usually needed at the beginning and completion of a response action. They can also be used to describe significant developments at the site. They help ensure that the media provide accurate technical information to the public.
- **Progress reports**. Community relations staff must provide local officials and citizens with periodic progress reports and fact sheets on site activities. These reports should summarize past work and should provide details of upcoming activities. The staff should encourage the community to comment on these reports. Where the level of community interest is high, staff should distribute progress reports on a monthly basis.

4. Implement activities specified in the CRP.

Following the activities laid out in the CRP can help ensure that adequate attention is given to the community's need for information and for input into technical decisions at the site. On occasion, it may be necessary to deviate from the plan. As Chapter 5 points out, the CRP is a dynamic document that should be updated to conform to changing citizen concerns and to revisions in the technical schedule for the response action. If a planned removal extends beyond three months, it is advisable to review the plan, to evaluate whether it meets both the government's and the community's needs, and to modify the plan as necessary.

5. Prepare a responsiveness summary.

When the planned removal is concluded, a final report or "responsiveness summary" must be prepared and should be submitted to the Office of Policy and Program Management in the Office of Emergency and Remedial Response, EPA Headquarters. This in-house report must describe the community relations activities conducted and the major issues that arose at the site. In addition, it must evaluate the effectiveness of the community relations program at the site. The purpose of the report is to document EPA and state actions, to assist in community relations planning in the event that long term remedial response occurs at the site, and to help plan for subsequent community relations programs at other sites. The summary may be used to help document for the public record how EPA responded to key community concerns and issues.

CHAPTER 3

COMMUNITY RELATIONS DURING REMEDIAL RESPONSE

This chapter provides guidelines for conducting community relations activities during remedial actions. Remedial actions are those responses to releases on the National Priorities List that require longer term and possibly more expensive efforts to prevent or mitigate the migration of releases of hazardous substances. (See the definition of remedial response in Section 300.68 in the National Contingency Plan.) **A community relations program is a key part of EPA and state activities during a remedial action.** As pointed out in Chapter 1 of this handbook, without a program of ongoing communication between the community affected by the release of hazardous substances and the agency responsible for cleanup, EPA and the state cannot provide accurate, understandable information to the community about site problems and cannot incorporate community concerns into decisions about response actions.

When the federal government has lead responsibility for a remedial action, the U.S. Army Corps of Engineers will usually be responsible for management of remedial construction. Community relations, however, will continue to be the responsibility of EPA during all stages of the response; the state may play a supporting role. When the state has the lead responsibility for the remedial action, EPA staff will review state programs and may participate in community relations activities, as specified in the cooperative agreement. Therefore, community relations during a remedial response may involve the efforts of three or more agencies: EPA or state staff will manage the program, and in certain cases, the Corps of Engineers will provide technical assistance. In addition, other federal or state agencies may be responsible for certain aspects of a response, with corresponding responsibilities for community relations. The Federal Emergency Management Agency, for example, manages Superfund-financed relocations of residents and businesses, when necessary.

The blueprint for community relations programs at remedial action sites is the community relations plan (CRP). This chapter discusses communications activities that could be incorporated into a CRP for a remedial action.* These activities or techniques, suggested here as general guidelines, correspond to each of the technical stages of a remedial response. In practice, however, a remedial action may not be as neatly structured as this chapter suggests. **Every site presents distinctive problems; every community has unique needs and expectations to consider.** Moreover, the specific communications activities selected for a site will depend partly on the staff responsible for managing them, as the techniques that work best are often those with which staff feel comfortable.

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*Staff responsible for community relations planning should also consult Chapter 5 and Appendix A for a detailed summary of remedial action planning requirements.

The guidance in this chapter is organized according to the following division of a remedial action:

1. Preliminary Assessment
2. Site Inspection
3. Priority Listing and First Notification of Proposed Action
4. Remedial Investigation
5. Feasibility Study: Development and Selection of Alternatives
6. Remedial Design
7. Construction
8. Monitoring and Documentation
9. Summary

1. Preliminary Assessment

Community outreach is important even during site discovery and assessment. A great deal can be learned about the concerns of the affected community through a few small steps.

At this stage, the people most interested in learning of Superfund planned actions and most eager to communicate their understanding of site problems may be the local officials: the mayor, public health chief, public works chief, and so forth. Therefore, one of the first actions community relations staff should take during the preliminary investigation of a site is to establish contact by phone with state and local officials and with key citizens who can provide some information about the scope and history of the problem. These early telephone conversations should be used to gather information on the technical and communications aspects of the problems posed by the release. Community relations staff should also use these early contacts to explain the limitations on the help available through Superfund. Unrealistically high expectations of federal action and funds can lead to demands that cannot be met at a later stage.

The preliminary assessment will not normally involve any official EPA or state presence at the site. During this stage, it can be misleading to give community relations activities a high public profile as further actions may or may not be forthcoming.

2. Site Inspection

At this stage of a remedial action, EPA or a state has decided -- based on the preliminary assessment -- that the site warrants additional study. Community relations activities during a site inspection should focus on informing the community of site inspection activities and the likely schedule of future events. Staff should emphasize the tentative nature of any plans and should stress that the inspection should not be viewed as evidence of a serious contamination problem. Community relations staff should inform the community through a brief fact sheet that the site inspection is limited in scope, and is intended primarily to gather any data needed for ranking on the National Priorities List.

3. Priority Listing and First Notification of Proposed Course of Action

Community relations efforts become critical once EPA has set priorities and evaluated a site for remedial action. **At this point, EPA or state staff must conduct on-site discussions with local officials and citizens, evaluate the nature and level of citizen concern, and determine how the remedial investigation and feasibility study may affect citizen concerns.** The on-site discussions and the assessment of citizen concern will become the foundation of the CRP for the site. These activities are described below.

3.1 On-Site Community Discussions

Site problems go beyond the physically measurable, technical problems of hazardous waste releases. The community setting of the hazardous substance problem must also be understood before investigating the problem and proposing a technical solution. Community relations staff should, therefore, conduct a series of short on-site discussions with the state and local officials involved with the site, citizen leaders representing interest groups, business leaders, environmentalists, members of other community groups such as the League of Women Voters, and any other interested citizens. The information gleaned from these discussions may enhance the technical understanding of the site if local officials and residents know of past dumping practices. In addition, these discussions can provide valuable information about local attitudes toward the site and past government actions. Thus, these discussions provide an opportunity for public input to the planning process. They also enable community relations staff to identify the best means to provide information to the community during the response action.

3.2 Assessment of Citizen Concern

On the basis of these community discussions, community relations staff should assess the nature and level of citizen concern about the site. (See Chapter 4, Assessment of Citizen Concern: A Procedure and Appendix B.) An evaluation of the following factors can help staff determine how the level of citizen concern at a site compares to concern at other sites, and whether concern is likely to increase or decrease over the course of the action:

- Whether families in a community believe their children's health may be affected by the release;

- Whether local homeowners and businesses believe that the site has caused them or will cause them economic loss;
- Whether EPA's or the state's past performance at the site is viewed by the public as competent and their statements as credible;
- Whether an active, vocal group leader has emerged from the local community and whether the leader has a substantial following;
- Whether events at the site have received substantial coverage by the media; and
- Whether more than three or four households perceive themselves as affected by the site.

The judgments about the nature and level of citizen concern should be reflected in the selection of communications activities to be used during the response action. This evaluation should be explicitly stated in the CRP.

3.3 Assessment of Technical Complexity

The selection of community relations activities during the remedial action should also be influenced by the level of technical complexity at the site. All other things being equal, the more difficult the problems at the site and the more complicated the probable response action, the more comprehensive and detailed the community relations program required. Some likely indicators of greater technical complexity at a site include:

- Heavily or widely contaminated groundwater;
- A complex mix of chemicals;
- Jointed or fractured bedrock indicating potentially deeper contamination;
- A very large volume of contaminated material;
- The presence of very toxic, persistent chemicals;
- A large population potentially at risk;
- A sensitive or protected ecosystem at risk; or
- Other characteristics that make remedial action longer, more difficult, more expensive, or harder to evaluate than average.

The analyses of how the level of technical complexity and the proposed timing of response actions affect the selection of communications activities for the site should also be described briefly in the CRP.

3.4 Preparation of the CRP

Having completed the on-site discussions and the assessments of citizen concern and technical complexity, the community relations staff must then prepare a draft CRP. The draft CRP must be submitted with the draft Action Memorandum for federal-lead sites or with the draft cooperative agreement for state-lead sites. It must include:

- A description of the site's background and the background and history of community involvement at the site;
- Community relations objectives for the site during the remedial investigation and feasibility study;
- Any immediate community relations activities recommended prior to approval of the complete CRP;
- A list of affected and interested groups and individuals, their affiliations, addresses, and telephone numbers;
- A schedule for completing the CRP; and
- The date the draft CRP was prepared.

The draft CRP will form the basis of the complete CRP which must be submitted: (1) for federal-lead sites, within four weeks of the submission of the draft Action Memorandum or prior to the initiation of the remedial investigation, whichever comes first; or (2) for state-lead sites, with the final cooperative agreement package. The complete CRP must include:

- The information presented in the draft CRP, updated if necessary;
- A specification that the public will be given a **minimum three week comment period** to review the feasibility study prior to the selection of the recommended alternative and an explanation of how this comment period will be structured;*

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*At the time the CRP is drafted, staff may know that an initial remedial measure (IRM) will be needed at the site. Where an IRM will be needed, the CRP must address how the community will receive prior notification of any action. In addition, the CRP must state that citizens will have an opportunity to comment on any recommended complex IRM at the conclusion of a limited feasibility study, and must explain how a minimum two week comment period will be implemented. See Section 5 of this chapter for further detail.

- A specification of the activities and techniques that will be used to keep the community informed of actions at the site and to elicit citizen input (e.g., meetings with citizen groups, periodic progress reports);*
- A list of technical and community relations staff responsible for the site;
- The community relations program budget; and
- A workplan and implementation schedule.

The objectives and activities specified in the CRP should be consistent with the community's concerns and need for information. Community relations activities should also be tied to specific events in the technical response schedule (e.g., small group meetings or briefings could be scheduled at the initiation of the response action and during the comment period on the feasibility study). Because the level of community concern and technical problems differ at every site, there is no standard community relations program. As an aid to community relations staff, however, this chapter presents suggested activities corresponding to each stage of the remedial action.

4. Remedial Investigation**

The purposes of the community relations program during the remedial investigation are to establish effective mechanisms for:

- **Distributing understandable, accurate information about the progress and findings of the investigation to the public**; and
- **Eliciting citizen views about the findings of the investigation.**

Contact between agencies involved in cleanup and community members can be initiated and sustained in several ways. One of the most effective management tools is to designate a Superfund community relations coordinator for the site to channel both citizen and intergovernmental contact. Diplomatic skills on the part of the coordinator are very important; being a good engineer or program manager alone is not enough for this sensitive position. The coordinator must be available to hold meetings and be interviewed after office hours, when residents may likely be available. It is not necessary that the community relations coordinator be present at the site everyday; however, the coordinator's schedule should be well-publicized.

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*In addition to the requirement for a comment period on the feasibility study, the CRP must include a brief description of how community relations staff will provide progress reports to the local community. Where interest and concern are high, staff should distribute progress reports -- either written briefings or fact sheets -- on a monthly basis.

**At some sites the remedial investigation and feasibility study are treated as one study and as one stage in the remedial action. Where this occurs, community relations staff should plan and implement activities appropriate for a combined study.

Useful forms of citizen-agency interaction during the remedial investigation stage that should be specified in the CRP include:

- Informal meetings for distributing significant test results or other information about the response action;
- Meetings with individual citizens or groups of citizens affected by any results of health studies;
- Briefings of local officials and state and federal legislators;
- Public consultations and workshops, where community relations staff meet with small groups of citizens to keep abreast of community concerns and pass on information;
- Progress reports, fact sheets and news conferences;
- A repository for site information at the local library, health office, or community center that contains approved technical documents, official phone numbers, and the CRP;
- Site visits.

The use of an information repository is encouraged and should be established as soon as the state contract or cooperative agreement is signed.

It is possible that local citizens will not want to become involved in and extensively informed about the problem of hazardous substances at this stage. Alternatively, some citizen groups will make early and possibly large demands for resources on any agency that indicates an interest in helping the community. The coordinator should frequently assess the changing information needs of the community, and if necessary, modify the CRP to reflect these changing needs.

5. Feasibility Study: Development and Selection of Alternatives

A major community relations effort must accompany the development of cleanup alternatives during the feasibility study and the selection of the most cost-effective alternative. **The release problem is not resolved, no matter how adequate the technical measures implemented, unless the people for whom it has been a problem find those technical measures to be an acceptable solution. The goal of a community relations program at this stage is, therefore, to maintain communication with local officials and citizens, to explain the remedial alternatives in understandable terms, and to solicit citizen input into the selection.**

Special attention to community relations may be necessary at this stage if the remedial alternatives under consideration involve permanently containing wastes or other hazardous substances on-site. Citizens and local officials concerned about hazardous substance problems are generally reluctant to accept a "permanent remedy" that does not remove all hazardous substances from the site. Statutory cost-effectiveness requirements, and the decision procedures specified in the National Contingency Plan, however, give preference to on-site remedies. Planning for community relations efforts should take these requirements into account when estimating the likelihood of community opposition to the Superfund action at this stage.

Among the community relations techniques recommended during the feasibility study stage are the following:

- Public consultations prior to and throughout the public evaluation of the feasibility study;
- News releases, fact sheets, and progress reports that explain the study's progress and conclusions;
- Site tours;
- A continuation of the information repository; and
- Small public meetings, briefings, and workshops.

To ensure that citizens have ample time to review and provide input to the alternative response actions, **EPA requires that a public comment period precede the selection of the remedial alternative for feasibility studies.** The comment period requirement varies slightly for nonexpedited and for expedited feasibility studies.

For nonexpedited feasibility studies, a minimum three week comment period must precede the selection of an alternative. If there is a reasonable request for an extension (e.g., because documents are lengthy and complex or there is a delay in providing copies to the public), community relations staff should extend the review period, as long as the delay does not exacerbate threats to public health, welfare, or the environment at the site. Extensions should be for a minimum of one week and can be longer when appropriate. Copies of the feasibility study should be provided free of charge to citizens upon reasonable request and to the extent practicable. Prior to the comment period, the community relations coordinator and other officials must publicize the availability of the feasibility study and request written comments on the remedial alternatives. During the comment period, the coordinator should review with the community the advantages and disadvantages of the alternatives under consideration. Notice should be given of where written comments should be sent and the deadline for submission. The CRP must detail how the public will be provided opportunity to comment.

The comment period policy for initial remedial measures (IRMs), or those actions that can be taken quickly to limit exposure or threat of exposure to a significant health or environmental hazard during remedial planning, is similar: EPA must provide the affected community with information about the action and must elicit community views and concerns. **When the needed action consists of simple IRMs,* no comment period is required but EPA must provide advance notification of the action to the community.** Community relations staff should identify the most effective way(s) to inform the community of the action and to respond to citizen concerns. News conferences or news releases, combined with door-to-door contacts, phone conversations, or small group meetings, could be effective ways for providing information and for identifying community issues.

When a complex IRM is recommended following an expedited remedial investigation and feasibility study, the community relations staff must not only notify the community of the recommended action, but must also provide a minimum two week comment period. This comment period may be lengthened if the community requests an extension as long as the extension does not exacerbate threats to public health, welfare, or the environment at the site. During this comment period, community relations and technical response staff should hold small group meetings or workshops, provide fact sheets, or engage in other activities that explain the conclusions of the limited feasibility study to the community.

The alternative remedies for nonexpedited or expedited feasibility studies may be presented and reviewed at a public meeting or a formal hearing where public comment is invited. As noted above, **large public meetings or formal hearings are not necessarily encouraged**; small informal meetings and the other communications techniques listed above are encouraged instead because they are more effective in most situations. If community relations staff determine that a public meeting or hearing is necessary at this stage because of citizen requests or other reasons, such meetings or hearings should be preceded by extensive, informal interactions with local citizens, groups, and government officials. Small-group meetings, briefings, and committee meetings may be the best preparation for a productive formal meeting. Adequate advance notification (generally two weeks) must be given for a public meeting or hearing, if one is held, including newspaper and radio advertisements and posted notices. Even if a formal hearing is held, community relations staff should provide for receipt of written comments or testimony from those members of the community that cannot provide oral comments.

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*Simple IRMs include: staging/overpacking drums; runon/runoff controls; site security measures; dike/berm stabilization; fences; temporary covers; drum/tank sealing; and temporary relocation.

**Complex IRMs include: measures such as off-site transport or disposal of drums/tanks; off-site transport or disposal of lagoon liquids; sludges and highly contaminated soils; leachate treatment; and temporary water supplies.

At the conclusion of the feasibility study stage of a remedial action, community relations staff must prepare a "responsiveness summary." This in-house report reviews public inquiries and comments, the issues and concerns raised, and how EPA or the state responded. A responsiveness summary describes how the final remedial action decision incorporated local citizen concerns. If the government's selected alternative does not meet major citizen concerns, the summary should explain why members of the community do not support the recommended alternative. This report may be used to help document for the public record how EPA or a state responded to key community concerns and issues. The summary should be submitted with the draft Record of Decision to EPA Headquarters.

6. Remedial Design

During the engineering design and review stage, community relations can be critical, because different members of the community may become involved in response action issues or people not satisfied with the recommended alternative may press for additional action. **Thus, prior to remedial design, the responsible agency must revise the CRP** to account for the changing needs and concerns of the site community related to the selected cleanup option. The revised CRP should be submitted two weeks after the submission of the draft Record of Decision for federal-lead sites and with the draft amended cooperative agreement application for state-lead sites. The revised plan should specify all the major communications activities to be conducted during the remedial design and construction stages and should present a revised program budget, workplan, and schedule. Whenever the Corps of Engineers is involved with remedial design and construction, the plan should also describe the Corps' support role (e.g., the Corps' responsibilities for reviewing materials and participating in briefings). The responsibilities of other federal agencies (if any) involved in the response should also be outlined.

An effective community relations program for the remedial design stage might include:

- Briefings for local officials;
- Small meetings with citizens who demonstrate continued interest;

- Public service announcements on radio or TV;
- News releases;
- Fact sheets and progress reports; and
- A continuation of the local information repository.

The purpose of these activities is to explain to local officials and citizens the activities that will take place during engineering design, and once design is completed, to explain in understandable terms the design conclusions and construction proposal.

7. Construction

During site construction, the community relations coordinator should continue to inform area residents and businesses of the progress of construction, any health hazards that may be caused by construction, suitable hazard precautions, economic effects, new findings, and the reasons for any delays in the cleanup. To ensure that the local public is adequately informed, the community relations coordinator must provide site information to local officials and citizen leaders on a frequent basis. Appropriate techniques at this stage continue as before:

- News releases, fact sheets, and progress reports;
- Briefings for officials;
- Public consultations and small informal meetings;
- Site tours; and
- A continuation of the local information repository.

Community relations staff must also make sure local residents understand that cleanup of the site may not resolve all problems. Meetings with small groups of citizens and officials to explain the likely results of the remedial action may again be the most effective communications technique during this stage of the response action.

8. Post Cleanup Documentation

Upon completion of the cleanup, the EPA staff must evaluate EPA's and the state's interaction with the local government, interest groups, and citizens. **This includes the preparation of a responsiveness summary that should be submitted within one month of the completion of the response action to EPA Headquarters**. A responsiveness summary may help prevent problems at other sites; it will also suggest ways to continue public awareness at the completed site.

Citizens and officials should also be informed through small meetings and briefings about the limits of and resources available for operation and maintenance, and the agencies responsible. The future uses of the site should be clear.

9. Summary

Exhibit 3-1 summarizes suggested community relations activities discussed above for each of the stages of the remedial response. These techniques may or may not be useful at any given site. Some sites may not require extensive public consultations, briefings, etc., while responses at other sites may require several public hearings and frequent news releases. Chapter 4 describes in more detail each of the techniques listed in this chapter.

EXHIBIT 3-1

REMEDIAL RESPONSE AND COMMUNITY RELATIONS ACTIVITIES*

Step	Community Relations Activities
Preliminary Assessment	Telephone contacts, telephone discussions with officials and key citizens
Site Inspection	Brief fact sheet
Priority Listing and First Notification of Proposed Action	On-site community information discussions Assessment of citizen concern
Remedial Investigation	Fact sheet, progress report Briefings, workshops, and public information meetings News conferences Information repository
Feasibility Study	News release Fact sheet, progress report Public consultations Briefings, workshops, and public information meetings Information repository Comment period
Remedial Design	Fact sheet, progress report, or briefing News releases Small meetings, workshops Information repository
Remedial Construction	News releases Fact sheet, progress report Briefings Site tours Information repository
Post Cleanup Documentation	Small meetings and briefings

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*The community relations activities listed are examples of techniques that may be effective at Superfund sites. Community relations staff should select communications techniques that are consistent with the nature of community concern and the technical response schedule.

CHAPTER 4

EXAMPLES OF COMMUNITY RELATIONS TECHNIQUES

This chapter describes the purposes, benefits, and limitations of the community relations techniques that **may** be used in a Superfund response. It supplements Chapters 2 and 3, which explain when these techniques should be used during a removal or remedial action. The following techniques are discussed:

1. Telephone Contacts
2. On-Site Discussions
3. Assessment of Citizen Concern: Procedure
4. Briefings
5. Citizen Group Meetings
6. Exhibits
7. Fact Sheets/Progress Reports
8. Formal Public Hearing
9. Media Appearances
10. Presentations
11. News Conferences
12. News Releases
13. Site Tours
14. Public Consultations/Small Group Meetings
15. Public Inquiry Responses
16. Public Meetings
17. Workshops
18. Information Repository/Project File

As emphasized in Chapters 2 and 3, the key to a successful community relations program is targeting activities to the distinctive needs of the community. Therefore, **not all of the techniques described in this chapter are appropriate for every response action**. Appendix A describes further the importance of selecting the appropriate mix of techniques in the development of a **site-specific** community relations plan (CRP).

This chapter does not present an exhaustive discussion of public participation techniques. Readers should consult public participation manuals, such as the manuals prepared for EPA's water programs, for detailed information.

1. TELEPHONE CONTACTS

ACTIVITY Initial contact with congressional and local officials and concerned citizens **by telephone** informing them of EPA's and the state's interest in the site, finding out which individuals or groups are involved with the site, and setting up personal interviews for a later date.

PURPOSE **Removal Actions**: To gain an understanding of the level of community concern about the removal action. If time permits, telephone interviews may be used to collect additional information and establish contacts for public consultations at a later date.

Remedial Actions: To collect information about the site that will be used in planning a remedial response program. Types of information needed are:

- Background on the site and description of the problem.
- Recent government activities at the site.
- Nature and extent of citizen involvement.
- Names and telephone numbers of other possible contacts.
- Person's address for fact sheets, mailing lists, public consultation, or public meeting announcements.

TECHNIQUE The method used in contacting people by telephone is a matter of personal discretion and common courtesy. It is important, however, to know exactly what information is needed from the contact (e.g., additional references, site specifics, background information) and to be prepared with questions.

The following list includes possible contacts and the information available from each.

- **Local Congressional staff office**: After obtaining EPA and state clearance, contact the Congressional representative from the area in which the site is located. Coordinate all contacts with Congressional liaison office in the Region. State legislators should also be contacted.

1. TELEPHONE CONTACTS (continued)

TECHNIQUE (continued)

- **State health departments**: Health officials may have received complaints from citizens concerning the safety of a site. They may also know about active community groups that have addressed the hazardous substance problems in the state. Moreover, these officials will know about any state sponsored health effects studies or monitoring conducted at the site.
- **State environmental or pollution control agency** (and equivalent offices at the city and county level): Contacting state or local pollution control officials can be most effective for finding out about concerned citizens. Often, local resident and community groups have contacted officials at this level seeking answers to questions about potential hazards, etc. These officials can also provide impressions of citizen expectations.
- **Local elected officials** (mayors, city managers, etc.): They can explain not only what the citizens want, but also what steps, if any, have been taken to satisfy citizen demands. These officials can often put citizen concerns in perspective, identifying how important or unimportant the hazardous substance problem is to the community as a whole.

BENEFITS Telephone calls can be an inexpensive and expedient method of acquiring initial information about the site. During immediate removals, the telephone contacts can help the OSC identify and deal with community concern when time for more thorough community relations activities is not available. In remedial response actions, telephone interviews will often be useful for establishing a network of contacts to be used later during on-site community discussions.

LIMITATIONS The information received through telephone calls may not be accurate. The public may not know much about the site except what has been circulated in rumors or newspaper articles.

2. ON-SITE DISCUSSIONS

ACTIVITY On-site discussions with local residents, government officials, community groups, and media representatives. (Note: these are not surveys of community opinion; they are informal, on-site interviews conducted to obtain information and to elicit community concerns.)

PURPOSE To gain an understanding of the site's history, the community issues connected with the site, the level of citizen concern, and the political climate. These information interviews are also useful to identify credible sources and disseminators of information.

TECHNIQUE For planned removals and remedial actions, community information discussions are conducted prior to the preparation of the CRP.

Arranging the discussions: At this stage of the removal or remedial response, the names and phone numbers of the people involved with the site may have been obtained. Ideally, the meeting place should be at the interviewee's office or home, conducive to candid discussions. While government and media representatives are likely to prefer meeting in their offices during business hours, local residents and community groups may be available only after-hours. Meetings at their homes may be most convenient.

Planning the discussions: Prior to or during the discussion, time may be spent reviewing files that contain news clippings, documents, letters, and other sources of information relevant to the site. Officials should assign people with a thorough understanding of the Superfund program, the site's problems, and interview techniques to conduct the discussions.

Telephone interviews: In preparation for the discussions, some information may be efficiently obtained over the telephone -- for example, demographic facts about the community (population, median income, etc.). In telephone interviews, explain how the interviewee's name was acquired, and the reason the information is needed. Be brief. (See pages 4-2, 4-3.)

TECHNIQUES (continued)

Meeting with local government officials: Interviews with government officials should include a brief introduction explaining why they are being interviewed and what kind of information is needed (site history, government activity at the site, a political perspective on citizen's expectations, etc.).

Meeting with residents and community groups: Interviews involving local residents or community groups are likely to require more time. Be prepared with a discussion guide -- questionnaires are too formal and are likely to elicit curt responses. Be sensitive to the residents' needs but remind them that the purpose of the interview is to gather preliminary information to be used in planning response actions and appropriate citizen participation programs. In this way, unrealistic expectations are not raised.

In many cases, the interviewee will ask questions and express concerns about the site. With adequate preparation, the interviewer can thus acquire information useful for later planning, as well as respond to initial citizen concern with accurate information and allay unwarranted fears.

Confidentiality: At the beginning of each discussion, explain that the report will be presented to EPA or state officials and other interested persons. If the interviewee would like to remain anonymous, explain that the information will be used to understand community concerns and that a record of the contact will be made, but EPA or the state will not attribute any specific statements or information to the interviewee.

Other possible contacts: During the discussions, ask for names and phone numbers of persons who could provide additional information on the site.

Information on citizen participation activities: Ask whether the interviewee would like to receive any fact sheets or other printed information as the response action continues. Also, for future reference, keep a list of persons interested in attending public consultations and public meetings.

Maintain list of interested citizens: Staff should keep a list of citizens who will be interested in participating in meetings and briefings and receiving information. This list should be updated from time to time.

BENEFITS The views of citizens and government officials are often not stated clearly in the media. On-site discussions, however, are excellent sources of opinions and expectations regarding a response action. In addition, these interviews may lead to additional sources not previously considered. Contacting the full range of interested parties early in the remedial process means that officials will not be surprised when groups surface later on.

LIMITATIONS Much subjectivity is involved in assessing the motives and credibility of each interviewee. In reporting on discussions to other EPA or state officials, evaluative statements must be attributed to specific sources.

In addition, it is important to recognize that officials may have political or other motivation to withhold or distort information. Recording interviews when possible may help clear up misunderstandings that might arise in such circumstances.

Another limitation of the on-site discussions is that some interviewees -- particularly government officials -- may believe that their activities at the site are being evaluated. Assure them that this is not the intention and that the purpose of the interview is to help community relations staff understand the community's views about the site before beginning cleanup actions.

NOTE: See Appendix B for further information.

3. ASSESSMENT OF CITIZEN CONCERN: PROCEDURE

ACTIVITY An assessment of citizen concern about the release of hazardous substances. Information derived from this procedure can assist officials in estimating the level of effort to devote to community relations at the site.

PURPOSE To provide additional information on the level of community concern. This procedure may be useful in:

- Assessing local concerns where no previous contacts with the community have been made;
- Confirming the judgments of field personnel on the level of concern in a community; or
- Reassessing preliminary judgments about citizen concern.

TECHNIQUE This procedure is best used after the completion of the community information discussions, performed by community relations staff or a contractor. These on-site discussions provide background information and indicate future directions of local concern. If initial assessments of citizen concern have already been made, an accurate assessment of concern may require follow-up telephone calls to local officials and citizen leaders to update the information about the community.

Superfund officials may assess whether community concern at a site is high, medium, or low by determining the presence or absence of six characteristics after interviewing members of the local community. An analysis of citizen concerns at hazardous waste sites has shown that some of these characteristics are more important than others in determining the level of concern in a site community. The characteristics are:

- **Children's health** -- whether families in the community believe their children's health may be affected by the hazardous substances;
- **Economic loss** -- whether local homeowners or businesses believe that the site has caused them or will cause them economic loss;
- **Agency credibility** -- whether the performance and statements of EPA and the state are viewed by the public as competent and credible;

3. ASSESSMENT OF CITIZEN CONCERN: PROCEDURE (continued)

TECHNIQUE (continued)

- **Involvement** -- whether an active, vocal group leader has emerged from the community and whether the group leader has a substantial local following;
- **Media** -- whether events at the site have received substantial coverage by local, state, regional, and/or national media;
- **Number affected** -- whether more than three or four households perceive themselves as affected by the site;

If several of these characteristics describe the affected community, the community relations coordinator has grounds for considering that the level of community concern at the site may be medium to high or has the potential to be medium to high. Threats to children's health is a particularly strong indicator of a potentially high level of citizen concern at a site.

BENEFITS This procedure assists officials in identifying and measuring community concern at the site or in reassessing previous evaluations. Community relations staff should use this assessment in determining the kinds of communications activities to be conducted at the site.

LIMITATIONS This procedure is only one method to assess the level of citizen concern at a Superfund site. Although it is based on an analysis of the factors affecting levels of citizen concern at investigated sites around the country, the use of this procedure is necessarily subjective. The degree to which these factors are present is a matter of judgment.

NOTE If community relations staff determine that there is a low level of citizen concern at a site, staff should not assume that only a minimal community relations program is needed at the site. Every site needs an active, two-way communication program. The assessment of citizen concern should allow community relations staff to select those activities that best meet the community's characteristics and concerns.

4. BRIEFINGS

ACTIVITY Sessions held with local government officials, often before a news conference. Should precede meetings and workshops held with local citizens.

PURPOSE **Removal Action**: To notify officials of the nature and reasons for the action and to keep them informed of recent developments at the site.

Remedial Responses: To inform officials and other interested parties about recent developments at the site, to provide them with background material on the technical studies, results of the field investigations and engineering design, and to report to them on proposals and planning for remedial action.

TECHNIQUE **Inform local officials** or other attendees, generally 2 weeks before a scheduled briefing, that a briefing concerning recent activities at the site or other related topics will occur. It is usually best to hold the initial briefing in the office of the officials or at a local meeting room. Subsequent briefings should be held at a convenient time and location.

Present a short, official statement about the preliminary findings from the site activities (inspections, investigations, engineering design, etc.) and the EPA/state decision process, and announce future steps in the process.

Answer questions from local officials and other attendees about the statement. Anticipate questions; be prepared to answer them without getting involved in minor details and subjective judgments.

BENEFITS Because briefings are often held in conjunction with news conferences, they are useful in educating the local officials and other interested parties about the topics of the upcoming news conference.

LIMITATIONS Bad feelings or bad publicity could result if some individuals who believe they should be invited to the briefings are not. Care must be taken not to exclude these persons, or otherwise to convey an impression of favoritism towards other interested parties.

5. CITIZEN GROUP MEETINGS

ACTIVITY	Small group meetings between community relations staff and interested citizens sponsored either by the lead agency or by a group representing community interests.
PURPOSE	To exchange ideas about an appropriate remedy for the release. To clear up misconceptions or misunderstandings. To keep citizens informed and to encourage them to express their views.
TECHNIQUE	EPA's or the state's role is to help organize the meeting, to keep the group informed of developments in the response action, and to consider its views in making response recommendations or decisions.
BENEFITS	A citizens' group can provide EPA or the state with the public's perspective on the adequacy and acceptability of the proposed removal/remedial response. This information allows changes in the response program and can reduce the probability of public controversy after a solution has been implemented.
LIMITATIONS	Attendance at group meetings is not always a substitute for face-to-face consultations with individual citizens; it should be a supplement to other communications techniques.

6. EXHIBITS

ACTIVITY Setting up visual displays of maps, charts, diagrams, or photographs. These may be accompanied by a brief text explaining the displays and the purpose of the exhibit.

PURPOSE To illustrate issues associated with hazardous substance problems in a creative and informative display.

TECHNIQUE **Identify the target audience and the message** to convey. Possible audiences:

General public
Concerned citizens
Environmental groups
The media
Public officials

Possible messages:

Description of the site
Historical background
Proposed remedies
Health and safety effects associated with the site

Determine where the exhibit will be set up. For example, if the general public is the target audience, assemble the exhibit in a highly visible location, say a public library, convention hall, or a shopping center. On the other hand, if concerned citizens are the target, set up an exhibit perhaps at a public meeting. An exhibit could even be as simple as a bulletin board at the site or trailer if this is a convenient communications location.

Design the exhibit and its scale according to the message to be transmitted. Include photos or illustrations. Use text sparingly.

BENEFITS Exhibits tend to stimulate public interest and understanding. While a news clipping may be glanced at and easily forgotten, exhibits have a visual impact and leave a lasting impression.

6. EXHIBITS (continued)

LIMITATIONS Although exhibits inform the public, they are only a one-way communication tool. One solution to this drawback is to attach blank postcards on the exhibit, encouraging viewers to comment or submit inquiries by mail to EPA or the state. Another remedy is to leave the phone number of a contact who will be available to answer questions during working hours. Provisions must be made for responding to any such requests, however, or citizens may lose trust in EPA or the state.

7. FACT SHEETS/PROGRESS REPORTS

ACTIVITY A brief progress report on an issue of concern to the community. Includes summaries of past site work and details of upcoming activities. Must be distributed to government agencies with an interest in the site, area residents, citizen groups, the media, and other interested parties on a regular basis (at least monthly when there is a high level of citizen concern at a site).

PURPOSE To ensure public understanding of the issues involved in the response program and to present information on the progress and results of the removal or remedial action.

TECHNIQUE **Identify information** to be transmitted. The fact sheet may include the location of the site, the types or quantities of substances known to be at the site, the potential problems at the site, or an explanation of what EPA or the state intends to do about the site. Address recurring questions or issues of apparent concern in the fact sheet.

Select a simple format for transmitting progress reports and maintain consistency with that format. The fact sheet may simply state the facts or present the message using a question-and-answer format. Avoid using bureaucratic jargon or highly technical language because the audience is likely to be made up of individuals with widely-varying backgrounds.

Be concise. The purpose of the fact sheet is to provide facts, not opinions. Fact sheets are not the only way to keep the community informed of technical developments.

Include names and phones numbers of the person or office issuing the fact sheet and of other persons to contact for further information. Date the fact sheet to accommodate future references (e.g., for changes or updates).

BENEFITS The fact sheet provides interested persons with a brief summary of facts and issues involved in the cleanup operations.

LIMITATIONS If not well-written, a fact sheet, with its brief format, could be misleading or confusing. Such problems could cost much in time and resources.

8. FORMAL PUBLIC HEARING

ACTIVITY Formal hearings organized by EPA and the state and open to the public.

PURPOSE To provide an opportunity for formal comment and testimony on the proposed remedial action alternative.

TECHNIQUE **Anticipate the audience.** In many cases, communities do not become actively involved in hazardous substance issues until a cleanup solution is proposed. Citizens may begin to express a growing interest in the issue after the site remedy is selected. Citizens' informational needs should be adequately met before a formal hearing takes place. Fact sheets, small-group meetings, and briefings are good ways to disseminate necessary information in a timely way.

Schedule the hearing location and time so that citizens have easy access. Identify and follow any procedures established by the local and state governments for public hearings. Ensure the availability of sufficient seating, microphones, and recorders. Consider holding the hearing in the evening or on a weekend to accommodate the majority of concerned citizens.

Announce the public hearing at least 2 weeks in advance of the hearing date.

Provide notice of the public hearing in newspapers and in mailings to interested citizens. A follow-up phone call to ensure that the notice has been received is also recommended for major participants.

Provide an opportunity for local officials and citizens to submit written comments. Not all individuals will want to provide oral testimony. Community relations staff must publicize where written comments can be submitted and how they will be reviewed.

Provide a transcript of all oral and written comments. Publicize where the transcript is available for public review.

BENEFITS The major benefit of a formal public hearing is that it permits a prepared presentation of the issues and provides clear documentation of community concern.

LIMITATIONS A high level of citizen concern at a site may precipitate a disorderly public hearing, where citizen groups attempt to gain support for their positions. The public hearing can easily become an adversarial confrontation.

9. MEDIA APPEARANCES

ACTIVITY Live or taped interviews, or discussions held with local or national television or radio personnel.

PURPOSE To keep the public informed of what EPA or the state is doing about the release of hazardous substances.

TECHNIQUE **The need for participating in a media event should be carefully evaluated**. Do not draw attention to a problem that seems insignificant to most citizens, especially if the community is already sensitive about the attention it is getting.

On the other hand, if the community is unaware of or confused about the magnitude of the situation, broadcasts can reach a wide audience.

Plan exactly what to say ahead of time. Live interviews leave no room for mistakes or statements that might need to be retracted later.

BENEFITS A media appearance reaches a wide audience and permits only the most important issues to be covered.

LIMITATIONS A media appearance can unintentionally turn into a regrettable event if critical facts are misstated or the impression is conveyed that EPA or the state is not concerned about issues important to the community.

Another limitation is that media appearances, although they allow response to a reporter's inquiries, do not allow a response to individual citizen concerns; there is no immediate feedback from the audience. This limitation can be mitigated somewhat by reviewing, prior to the media appearance, previous assessments of citizen concerns.

10. PRESENTATIONS

ACTIVITY Speeches to selected audiences such as clubs and existing civic or church organizations and classes.

PURPOSE To improve the public's understanding of the problems associated with a release of hazardous substances and what EPA or the state is doing about them.

TECHNIQUE Presentations require a substantial amount of effort to be effective. A poorly planned presentation can distort residents' views of the situation. Develop a presentation that can easily be changed to suit different audiences.

Begin by selecting a standard format such as the following:

- Describe the problem
- Describe how the problem affects the public
- Discuss what EPA or the state is doing about it
- Discuss how citizens can help or obtain additional information

The tone and technical complexity of the presentation can then be adjusted to suit the audience's needs.

Plan the presentation to last no more than 30 minutes. It may be advisable to have several staff members prepared to deliver presentations. Use the remaining time to respond to questions from the audience.

Select supporting materials -- slides, graphics, exhibits, etc. -- that will capture and hold the audience's attention. Polish the delivery to achieve the same effect. Once the necessary materials have been compiled, **conduct a trial run in front of colleagues**.

Contact existing groups possibly interested in learning about hazardous substance problems. Announce the program in the media and through other communication tools.

Be prepared to give a presentation in the evenings or on weekends, or whenever it is convenient for citizens to attend.

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10. PRESENTATIONS (continued)

BENEFITS Because the presentation is delivered in person, the audience has a chance to ask questions, and EPA or the state has an opportunity to gauge citizens concerns.

Another benefit is that a group of people is reached at one time, alleviating the need for responding to individual inquiries.

LIMITATIONS It may be difficult to deviate from the format of the presentation to accommodate different concerns of the audience. These concerns will have to be addressed during a question-and-answer period after the presentation.

If a presentation is too long or not understandable to an audience, the audience may lose interest and become frustrated by an inability to obtain needed information in an efficient way.

11. NEWS CONFERENCES

ACTIVITY Information sessions held with media representatives.

PURPOSE **Removal Action**: To provide the media with accurate information concerning important developments during or after the action; to announce plans for any future actions at the site.

Remedial Response: To provide the media with accurate information concerning important developments in the remedial response program; to announce future plans for remedial action at the site.

TECHNIQUE **Arrange a news conference when the occasion warrants it.** Use the news conference only to announce significant findings. The information presented should carefully and accurately describe the seriousness of the situation.

Notify members of the local and regional media of the time, location, and topic of the news conference. Local officials may also be invited to attend, either as observers or participants, depending upon their levels of interest and involvement in the site response. Having a news conference with local officials underscores EPA's and the state's responsiveness and commitment to the interests and concerns of local officials.

Brief local officials and affected citizens about sample results or technical study conclusions before the news conference takes place. The affected community should not learn the results of sampling or studies through media sources. Community relations staff should hold briefings and news conferences early in the working week where possible so that citizens have an opportunity to contact staff and obtain additional information before the weekend.

Present a short, official statement, both written and spoken, about developments and findings. In addition, explain EPA and state decisions to proceed with a planned removal or remedial action and identify the next steps.

Open the conference to questions, to be answered by EPA or state officials, local officials, and other experts present, who have agreed to respond.

TECHNIQUE (continued)

Do not overuse news conferences. Other forms of communication, such as news releases, fact sheets, and public consultations and meetings will be used to report the results of the site inspection, field investigation, and EPA or state decisions. Drawing attention to preliminary results of technical studies may fuel unnecessary citizen fears or unreasonable citizen demands.

Gear the news conference to the magnitude of the problem at the site.

BENEFITS

News conferences provide a public forum for EPA and the state to announce plans and developments. They provide media coverage and are an inexpensive way to reach large numbers of citizens. By preparing a written statement, officials can help ensure that the facts are presented accurately to the media. During the question period, the EPA or state spokesperson can demonstrate knowledge of the site and may be able to improve media relations by providing thorough, informative answers to all questions.

LIMITATIONS

There are three major risks associated with news conferences. One risk is that a news conference can focus a high degree of attention on the situation, potentially causing unnecessary local concern. Consider using news releases, or other, lower-profile means of disseminating information if such distortion is likely. Second, the presiding official may say something that is inaccurate or that should not be quoted to the media. Another risk is that the official's comments could be taken out of context by the media and create false impressions among the public. This risk is heightened when the conference is not properly structured according to rules of order or protocol and unanticipated questions result.

12. NEWS RELEASES

ACTIVITY Statement of the development of on-site actions proposed by EPA or the state. The news release is to be distributed to the media. Information copies should be sent to local officials and citizen group leaders before their release.

PURPOSE To report the proposed course of action in investigating, containing, or cleaning up the release of hazardous substances. Timing of news releases should coincide with milestones in the response program, e.g., selection of an alternative or contractor(s), key project dates, and completion of containment or cleanup actions. News releases may also be used to report the results of a public meeting and describe the way citizen concerns were considered in the planning process.

TECHNIQUE **Learn the deadlines of the relevant news agencies and regional and local newspapers and broadcast media**. Get to know the editor and the environmental reporter who might cover the issue.

Contact other involved agencies at the federal, state, and local level to ensure that all facts and procedures are coordinated and correct before releasing the statement.

Select the information to be communicated. Place the most important and newsworthy elements up front and present additional information in descending order of importance. Enlist the aid of a public affairs officer in writing the release. The news release should state the proposed remedial response action and contain the following facts:

- The findings of the investigation
- A statement of what needs to be done
- A statement of what will be accomplished by the alternatives
- The costs and benefits
- The next steps

Use supporting paragraphs to elaborate on findings, alternatives, and other pertinent information. Mention any opportunities for citizen input (public consultations, public meetings, etc.), and cite factors that might contribute to earlier implementation or delays in the remedial action. Contact other involved agencies before releasing.

12. NEWS RELEASES (continued)

TECHNIQUES (continued)

Be brief. Limit the news release to essential facts and issues.

Use simple language and avoid the use of professional jargon and overly technical words.

Identify the issuer of the news release. The top of the sheet should include the following:

- Name and addresses of the issuing agency;
- Release time (For Immediate Release or Please Observe Embargo Until), and date;
- Name and phone number of a staff person to reach for further information; and
- A headline summarizing the action taken.

BENEFITS

A news release, if used by the local media, can quickly and inexpensively reach a large audience. News releases can inform citizens of activities at the site, and give them an opportunity to raise questions about the findings or the alternative remedies.

LIMITATIONS

Because news releases usually can contain only the most important information, minor details that the public may be more interested in are often excluded. Thus, a news release alone cannot address all citizen concerns; it must be issued in conjunction with other methods of communication where more attention to detail is permitted. When announcing controversial results, it may be useful to attach a fact sheet that contains more detailed information.

13. SITE TOURS

ACTIVITY Scheduled trips to the site for media representatives, local officials, and citizens during which an opportunity to ask questions and to photograph is provided.

PURPOSE To involve the media, local officials, and citizens in the community relations program, to inform them of the issues and problems associated with the site, and to make them aware of EPA's or the state's involvement.

TECHNIQUE Tours may be conducted during any stage of a removal or remedial response, as the situation warrants.

Draw up a list of individuals that might be interested in participating in a tour, including:

- Representatives of local newspapers and television stations;
- Interested local officials;
- Representatives of local citizens and/or service groups;
- Representatives of public interest or environmental groups that have expressed interest in activities at the site; and
- Individual citizens and/or nearby residents that have expressed concern about the site.

Use this list to inform people when site tours are being arranged.

If demand for site tours is great, select a maximum number that can be taken on site safely. Hold additional tours if necessary. Keep the group small enough so that all who wish to ask questions may do so.

Think of ways to involve the tour participants at the site. Instructions on how to read monitoring devices is one example.

Anticipate questions. A fact sheet distributed ahead of time describing the essentials about the site encourages questions regarding substantive issues. Have someone available to answer technical questions in non-technical terms.

Ensure that the tour complies with the safety plan for the site.

BENEFITS The media, local officials, and citizens become familiar with the site, the difficulties of solving the problem, as well as the individuals involved in cleanup operations. The result could be better understanding and more accurate reporting.

LIMITATIONS An arranged tour may lead people to believe that the problem is larger than it really is, particularly if technical aspects of the removal or remedial action are not explained clearly, in terms understandable to a lay audience.

Another limitation is that the public may attempt to engage EPA or state community relations staff in a heated, unproductive debate in the presence of media representatives.

14. PUBLIC CONSULTATIONS/SMALL GROUP MEETINGS

ACTIVITY Face-to-face meetings and conferences with small groups (5 to 10 people) of interested citizens in their homes or in small meeting places.

PURPOSE **Removal Action**: To inform citizens of the nature of any emergency actions in cases where immediate removals have been undertaken or to explain the process involved in a planned removal.

Remedial Response: To inform citizens of site activities and answer questions. Public consultations are appropriate techniques to gauge and develop a sensitivity to citizen concerns. They may also be used to provide advance notice of actions that could cause alarm, e.g., the detonation of explosive wastes.

TECHNIQUE **Identify interested citizens**. Contact one of the members of citizens' groups that would be directly affected by cleanup plans and offer to discuss cleanup plans at the group's convenience. Schedule the consultations after emergency actions are completed or after EPA or the state has accurate information to share with the citizens.

Select a meeting place conducive to two-way interaction. A citizens' home may be the best setting for this.

Cover such issues as:

- Extent of clean-up
- Safety and health implications
- Factors that might facilitate or delay the clean-up
- How citizens' concerns are considered in making response action decisions.

Familiarize the citizens with the major actors in the site clean-up. Citizens want to know who is responsible in case they have further questions or want to voice complaints or praise.

TECHNIQUE (continued)

Gear the discussion to the audience. Avoid discussing the release problems in highly technical terms unless citizens are knowledgeable about the topic.

Listen. Find out what the citizens want done. Some concerns may be met by making minor changes in the selected remedy. Other citizens' objections to the planned work would require revisions that change the cost and scope of work of the permanent remedy. Work out a possible compromise or explain the reasons why citizen proposed remedies appear to be unworkable or contradict program or statutory requirements.

Follow-up on any major citizen concerns, stay in touch with the groups, and contact any new groups that have formed.

BENEFITS

The primary benefit of public consultations is that they allow two-way interaction between citizens and EPA and the state. Not only will the citizens be informed about the proposed response, but the citizens will have the opportunity to ask questions and to express their thoughts on the issue.

Another attractive feature of public consultations is that they add a personal dimension to what could otherwise be treated as a purely technical problem. Familiarity with the considerations involved in selecting the remedy can relieve citizen apprehension about the hazardous substance problem.

LIMITATIONS

To be effective, attendance should be restricted to about 5 to 10 individuals. In situations where more than 10 citizens would like to be included, additional consultations or a single large public meeting may be required. Public consultations, however, use EPA or state staff resources intensively, requiring upwards of a half-day of staff time to reach a limited number of citizens.

Another limitation is that some citizens or environmental groups may perceive restricting the number of attendees as a ploy to "water down" the influence large groups may have on potential actions.

14. PUBLIC CONSULTATIONS/SMALL GROUP MEETINGS (continued)

LIMITATIONS (continued) Furthermore, unless Superfund staff have a plan that demonstrates that all interested citizens will have an opportunity to participate in a small group meeting, such meetings could be viewed as exclusionary.

15. PUBLIC INQUIRY RESPONSE

ACTIVITY Answering questions for the public and providing information when requested.

PURPOSE To keep the public informed of EPA and state activities throughout the response program.

TECHNIQUE **Staff should consider establishing a toll-free "Superfund hotline" or should publicize local telephone numbers that citizens can use to obtain information.**

Requests for information should be handled promptly. Telephone calls and personal visits leave little time to prepare a response; however, answer questions as thoroughly as possible without making the caller wait. If you are on a tight schedule, set up a more convenient time to answer the inquiry.

Make sure the caller's needs are understood, and state exactly what information will be sent in response to the inquiry. Take the opportunity to inform the caller about other sources of information.

Written inquiries allow more time to formulate clear, detailed answers, but it is important not to delay the response more than a few days.

BENEFITS Responding to public inquiries should serve two important purposes: to keep the public informed of response actions, and to demonstrate the desire to provide timely responses to citizen concerns.

LIMITATIONS It is difficult to judge whether or not citizen's questions have been adequately answered, or whether responses have been misinterpreted.

16. PUBLIC MEETING

ACTIVITY A large meeting open to the public. Experts are available to present information and answer questions. Citizens may ask questions and offer comments.

PURPOSE To inform citizens of ongoing response activities, and to discuss and receive citizen feedback on possible courses of action -- health studies, engineering studies, etc.

TECHNIQUE **Determine the participants**. Consider inviting informed local officials to make a short presentation and to respond to questions.

Draw up an agenda detailing specific issues to be considered or specific tasks that must be accomplished at the meeting.

Announce the meeting in local newspapers and broadcast media two weeks in advance of the scheduled date. Distribute flyers to those citizens and groups interested in attending. Before the meeting begins, review the agenda with participants. Clarify that the meeting is not a formal public hearing where testimony is received. Instead, it is a meeting to exchange information and comments.

Hold a meeting in a comfortable setting. Make sure the location is easily accessible, is well-lighted, and has adequate parking and seating available.

If desirable, hold the meeting under the auspices of an existing organization. For example, conduct the meeting as a part of an advertised presentation to a group such as the Rotary or the League of Women Voters (if they are open to the general public).

Begin the meeting by stating the purpose, then outline agenda and the procedures for making statements. State the meeting's time limit at the outset. Also state that if issues are not adequately addressed during the meeting, a follow-on meeting can be scheduled.

Present the issues concerning the site, preliminary findings, and proposed course of action. Allocate some time for citizens to express their concerns and ask questions. **Establish a time limit** for each citizen; this avoids lengthy presentations which could generate impatience and disrupt the meeting. Meetings may last from an hour to no more than three hours.

BENEFITS Public meetings provide the public with an opportunity to express their concerns to EPA, state, or local government officials. Meetings also provide an opportunity for EPA and the state to present information and a proposed course of action. Public meetings also provide one setting for the resolution of differences between the government and the community.

LIMITATIONS Public meetings may not be the best way to obtain citizen input. If controversy surrounding the site has escalated, a public meeting could provide an opportunity to intensify conflicts rather than resolve them. Evaluate the possibility of a public meeting getting out of hand by reviewing the site's history and level of citizen involvement in this and similar controversies. In addition, if citizens in the area view public meetings as distractions from the issues or if public meetings have been failures in the past, then use an alternative method, such as small public consultations, to transmit information and obtain feedback. Or, schedule a public hearing that is highly structured.

17. WORKSHOPS

ACTIVITY Formal seminars or a series of meetings that (1) promote intensive discussion of hazardous substance issues and (2) encourage citizens to provide comments on proposed response actions. Experts may be invited to provide explanations of the problems associated with releases of hazardous substances. Speakers may also address possible remedies for these problems.

PURPOSE To improve the public's understanding and to correct misperceptions of the hazardous substance problem. To enable EPA and state staff to identify citizen concerns and to receive citizen comments.

TECHNIQUE Workshops must be conducted in a manner that does not agitate the public or create unnecessary fears. Workshops are in part meant to educate citizens, allowing them to become aware of the difficulties in handling release problems and enabling them to understand the problems.

Planning the workshop. Make sure an adequate number of participants in the workshop are available. If there are too few, consider holding an informal meeting for those concerned and postpone the workshop until additional interest develops. Decide ahead of time on a minimum and maximum number of workshop participants.

Announce the workshop well in advance (at least two weeks) of its scheduled date. Send out invitations and registration forms to concerned citizens. Provide for multiple registrations on each form to accommodate friends who might also be interested in the workshop. Emphasize that there is a limit on the number of persons who can participate in the workshop, and provide a deadline for registration. If the budget permits, announce the workshop in the local newspapers and distribute posters around town.

Cover the following topics:

- Nature of release problems
- Methods of containing and cleaning up release
- Identification of health or environmental problems
- Citizen comments on the technical response that is proposed or under way

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17. WORKSHOPS (continued)

BENEFITS	Workshops provide more information to the public than is possible through fact sheets. They also allow for two-way communication between the public and the persons who are running the workshops, thereby answering many of the citizens' concerns and questions. For this reason, workshops are particularly good for reaching opinion leaders, interest group leaders, and the most affected public.
LIMITATIONS	Workshops reach only a small segment of the population unless a number of them take place.

18. INFORMATION REPOSITORY/PROJECT FILE

ACTIVITY A locally-established project file or repository containing site information and documents on site activities.

PURPOSE To allow free and convenient public access to information on the nature of site problems and response activities. An information repository is a central project file where citizens can review all site-related documents approved by EPA or the state for public disclosure.

TECHNIQUE **Determine a location early in the response action**, as warranted. Depending upon the level of citizen interest in activities at the site, establishing a local repository may be an effective way to communicate information to the community. Typical locations for the file might be the local public library, town hall, or health office.

Select and deposit the materials to be included in the file. Typically, a project file may include:

- News releases and clippings about the site;
- Site descriptions;
- Technical data concerning the hazards posed by the release and the response actions (e.g., remedial investigation reports and feasibility studies);
- Non-technical descriptions of the site problems and the response actions;
- Any reference materials relevant to the site (e.g., maps, chemical references, etc.);
- Announcements of all community relations activities;
- A list of contact personnel, with addresses and telephone numbers, from whom further information can be requested.

Publicize the existence of the repository. Notify local government officials, citizen groups, and the local media of the project file's location and hours of public access.

18. LOCAL REPOSITORY/PROJECT FILE (continued)

TECHNIQUE **Make sure the file is kept up-to-date.** Timely replacement of dated information helps avoid unnecessary misunderstandings.

BENEFITS An information repository provides local officials, citizens, and the media with easy access to accurate, detailed, and current background data about the site. It demonstrates that officials are responsive to citizens' needs for comprehensive site information.

LIMITATIONS A project file requires diligent maintenance to avoid misunderstandings based on dated information. Also, there is always a risk that information contained in the file may be used out of context.

CHAPTER 5

ADMINISTERING A COMMUNITY RELATIONS PROGRAM

Chapters 2 through 4 describe techniques community relations staff can use to develop an effective community relations program for removal and remedial actions. This chapter provides guidelines on program administrative requirements for planning, reporting, and personnel. It first examines the development, contents, and format for a community relations plan (CRP) -- the key program planning, management, and budget tool. It then describes the requirement to submit program status reports to EPA Headquarters. Finally, it explains the division of responsibility for community relations between Headquarters and EPA Regional Offices, and discusses how to use contractor support appropriately. The guidelines on developing CRPs apply either to EPA staff or state agencies taking the lead on Superfund community relations activities.

A. PROGRAM PLANNING

This section describes EPA requirements for the development of CRPs. Staff responsible for developing community relations programs should consult Appendix A to review suggested formats for community relations planning documents.

1. Development of a Community Relations Plan

The CRP is the planning, management, and budget document that guides the community relations program at Superfund sites. CRPs must be developed for all Superfund planned removal and remedial actions. In addition, a profile of community concerns and a short version plan must be developed for certain kinds of immediate removal actions. Specific planning requirements for each type of Superfund action are described below.

1.1 Immediate Removals

Chapter 2 describes a two-step planning process for immediate removal community relations programs:

- **A community relations profile** must be prepared for immediate removal actions that last longer than 5 days. It must contain a brief analysis of the nature of citizen concern, the key site issues, and program objectives. The profile should explain how community relations staff intend to plan for and implement community relations activities at the site. It must be submitted with the Immediate Removal Request (the "10 Point Document").

- **A brief CRP** that describes the site background, the nature of community concern, the key site issues, site-specific community relations objectives, and activities to be undertaken at the site must be prepared for any immediate removal that may last longer than 45 days.

See Appendix A for suggested formats for the immediate removal community relations profile and plan.

1.2 Planned Removals

Planned removal actions usually allow more time than immediate removals for planning and consultations with the local community. The draft Action Memorandum requesting approval for a planned removal must state that a CRP has been prepared and should briefly summarize citizen concerns. **A CRP covering the entire planned removal action must be prepared along with the "14 Point Contractual Document".** The required elements of a CRP for a planned removal action are identical to the required elements for a remedial action. These are explained below, and are discussed further in Appendix A.

1.3 Remedial Actions

As explained in Chapter 3, CRPs must be developed for all Superfund remedial actions, and must be revised throughout the response action to reflect changing needs of the community and alterations in the technical schedule.

The draft CRP must be submitted with the draft Action Memorandum for federal-lead sites or with the draft cooperative agreement for state-lead sites. It must include:

- The background and history of community involvement (site history, local activity and interest, and key community issues);

- A list of affected and interested groups and individuals, their affiliations, addresses, and telephone numbers;

- Site-specific objectives for the community relations program;

- A schedule for completion of the CRP; and

- A description of any immediate community relations activities recommended prior to submission of the complete CRP.

The complete CRP for the site must be prepared either 1) within four weeks of the submission of the draft Action Memorandum or prior to the initiation of the remedial investigation, whichever comes first for federal-lead sites; or 2) with the final cooperative agreement package for state-lead sites. The complete CRP includes:

- The information presented in the draft CRP, updated if necessary.
- A list of communications activities to be conducted at the site, an explanation of how these activities will be conducted, and a description of how these activities relate to the technical response schedule.
- A budget, schedule, and workplan.
- A list of technical and community relations staff responsible for site work.

The plan should clearly identify the roles and responsibilities of all federal agencies that may be involved in the response action (e.g., the Federal Emergency Management Agency or the Army Corps of Engineers). There should be a provision for coordinating the activities of different federal, as well as state and local, agencies. The division of responsibility among various federal agencies for community relations during Superfund response actions is outlined in interagency agreements or memoranda of understanding.

The complete plan must specify that the community will have an opportunity to comment on the feasibility study prior to the selection of site remedy, and must describe how community relations staff will implement the required comment periods for nonexpedited and expedited remedial actions. (See the comment period discussion on pp. 3-8 and 3-9 of this handbook.) The plan must be sufficiently flexible to permit an extension of the review period where an extension is warranted. At sites where there is significant public interest, the plan should also provide for monthly fact sheets or progress reports on technical and community relations work. In all cases, the plan should provide that the community must receive advance notification of any action at the site.

EPA or state staff should revise the plan any time a major change takes place in the community's needs for information or in the technical schedule. The CRP, however, must be revised when the feasibility study is completed to incorporate communications activities planned for the design and construction phases of the action. The budget, schedule, and workplan should be revised at this point as necessary. **The revised CRP should be submitted two weeks after the submission of the draft Record of Decision for federal-lead sites or with the draft amended cooperative agreement application for state-lead sites.**

2. Plan Review Requirements

At the time this handbook was prepared, EPA Headquarters was revising plan review requirements to reflect Headquarters and Regional Office responsibilities under new delegations of authority. Community relations staff should, therefore, consult the memorandum accompanying this handbook and any later guidance on plan review requirements for detailed information on the review and approval of CRPs and other program documents.

B. QUARTERLY STATUS REPORTS ON COMMUNITY RELATIONS

Each EPA Region is required to submit to Headquarters quarterly reports on Superfund community relations activities. The reports should be sent to the community relations coordinator in the Office of Policy and Program Management, Office of Emergency and Remedial Response. It is recommended that the responsibility for preparing these reports be assigned to the Regional Superfund community relations coordinator. Quarterly reports are due on December 31, March 31, June 30, and September 30. Guidance on the preparation of quarterly reports and, the quarterly report format are contained in Appendix C.

C. EPA COMMUNITY RELATIONS PERSONNEL

1. The Role of Headquarters and the Regions in Implementing Community Relations Programs

EPA Headquarters and Regional Office staff have specific responsibilities for the implementation of a community relations program at a site.

Headquarters is responsible for policy development, tracking Superfund community relations activities through quarterly status reports, developing training programs, oversight of community relations implementation, program evaluation, and resource analysis. Headquarters provides informational materials on the Superfund program, expert personnel for temporary community relations work at critical sites, overall contract management, and other support services required in the field.

For EPA-lead responses, the Regions take the lead on developing community relations plans and programs, developing site-specific public information materials, supervising (through superfund project officers) Regional Office community relations subcontractors, and implementing community relations programs.

2. Contractor Role

Technical contractors (such as architectural and engineering firms) can provide support services for Headquarters and Regional Office community relations program activities in a number of situations. **One principle must be maintained throughout the program: contractors must never represent, or even appear to represent, EPA before the public, other government officials, or the media.**

3. Appropriate Tasks for Contractors

The community relations programs at individual sites will include many activities for which it is appropriate to make use of contractor staff. Some activities will be routine; others will involve behind-the-scenes preparation; still others may require special expertise. Contractors are especially useful for ensuring that technical information is accurate and comprehensible.

Exhibit 5-1 illustrates the appropriate responsibilities of contractor staff for a number of standard community relations activities. The amount of contractor assistance asked for, and the division of responsibility between EPA and contractor staff, will vary from site to site. The preparation and distribution of any written materials, as well as all appearances before the news media, must conform to EPA policy on such matters.

Technical contracting firms and their employees may be inexperienced in assisting with community relations activities. The following section discusses the capabilities that contractor staff assigned to community relations should possess, and suggests how to evaluate contractors' performance in this area.

4. Evaluating Contractors

a. Staff Qualifications

The most important contractor qualification is a clear understanding of the specific communications and technical problems at a site. Without such an understanding, it is difficult to speak straightforwardly and informatively to interested citizens and officials, as a good community relations program requires. Because the community relations program is a two-way communications program, one-way public relations skills are not sufficient. Instead, the following qualifications should be looked for in the contractor staff assigned to community relations activities:

- **Strong interpersonal skills**: the ability to listen well, to speak clearly, to know how to answer a question in a way that will not frustrate or anger someone very concerned about a sensitive issue.
- **The demonstrated ability to write clearly** and to distill detailed information into a form suitable for a news release or a fact sheet.
- **The willingness and ability to learn the technical complexities** of a site's geohydrology, the engineering measures conducted in response, and the potential effects of the substances at the site on human health.

- **Knowledge of the kinds of measures that will be used to keep a community informed of plans** for and progress at a site: interviews, informal consultations, public meetings, news briefings, audio-visual aids, workshops, responsiveness summaries.
- **Proof of administrative competence**: the ability to organize a large meeting down to the last detail to carry out assigned tasks punctually, to produce written materials that are clear and neat.
- **Demonstrated capacity to account for and control expenditures**.

Furthermore, the qualifications of contractor staff should be matched to the tasks to which they are assigned. There is no need, for example, to have a senior staff member arrange a meeting.

b. Evaluation

The community relations assistance provided by contractors may be evaluated by means of the written reports required by the program, spot checks with various sources, and the project officer's ongoing assessment of overall performance. To supplement written reports as a basis for evaluation, Headquarters or the Regional Offices may sample the techniques used by contractors for their quality and effectiveness. For instance, the research performed for a fact sheet or exhibit can be evaluated for clarity, factual content, and style. Local newspaper accounts can be used for independent assessments of the effectiveness of the community relations activities recommended or assisted by the contractor. In addition, citizen leaders can be contacted to determine what the local community thinks of the contractor's efforts. Not all of these techniques are necessary, but some form of confirmation besides contractor reports and Regional Office evaluations will be useful in many cases.

EXHIBIT 5-1

SAMPLE TASKS FOR CONTRACTORS IN A COMMUNITY RELATIONS PROGRAM*

Activity	Contractor Responsibilities	EPA or State Responsibilities
Community information interviews	Conduct interviews, analyze socio-political environment, prepare report on site history and actors, brief EPA	Clear up any questions by interviewees, attend briefing
Community relations plan	Develop and draft plan	Review and approve plan
Telephone contacts	Make follow-up calls, set interview dates, develop community mailing list	Make initial calls to all elected, appointed, and citizen leaders
News releases	Research text of releases	Draft, edit, and release
Public consultations	Arrange small meeting with citizens and EPA staff, prepare agenda	Meet with citizens and answer questions
Fact sheets	Research fact sheet; reproduce and distribute sheets	Draft, edit and approve fact sheet
Briefings and news conferences	Arrange time and location; brief EPA staff on how to answer difficult questions, etc; arrange any written handouts	Invite officials or reporters, practice answers with contractor staff, edit and approve handouts, prepare opening statement, answer all questions (contractors do not participate)
Workshops on hazardous waste	Design and conduct workshops in interested communities; arrange all logistics and support	Make available technical staff to discuss testing techniques, alternative solutions, etc. for workshop
Formal public meeting or public hearing	Arrange time and location, prepare public notice, advise and prepare EPA speakers, prepare agenda and any support materials (including audio-visuals)	Conduct hearing. Discuss site problems and progress, roles of EPA, state, other agencies, etc.; answer questions
Public inquiry responses	Prepare routine responses for EPA approval, aid in researching more involved responses	Read all letters, divide into routine and involved answers, write involved answers; handle all phone inquiries; approve all responses
Graphics	Prepare graphics for presentations or briefings	Review and approve all graphics

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*The EPA Regional Office or the state response agency directs all contractor work. The support activities listed on this exhibit are performed at the discretion of the staff with responsibility for the community relations program.

EXHIBIT 5-1 (continued)

POSSIBLE TASKS FOR CONTRACTORS IN A COMMUNITY RELATIONS PROGRAM*

Activity	Contractor Responsibilities	EPA or State Responsibilities
Exhibits	Prepare exhibits	General design and approval
Presentations	Coach EPA speakers, provide audio-visual support	Design and deliver presentations
Media appearances	Brief EPA speakers	Prepare substantive answers, practice form and style with contractor
Site tours	Arrange time and meeting place, contact tour participants, arrange protective gear, provide handouts (maps, test results, fact sheets, etc.)	Act as tour guide, answer questions
Concluding report	Assemble information, prepare report	Review, revise, and approve

CHAPTER 6

COMMUNITY RELATIONS AND ENFORCEMENT ACTIONS

(Reserved)

APPENDIX A

COMMUNITY RELATIONS PLANNING DOCUMENTS

INTRODUCTION

To encourage the design and implementation of effective community relations programs at Superfund sites, community relations planning begins early in the response action and is generally completed before site work is initiated. This appendix describes how to prepare the community relations documents that are an integral part of the Superfund program: the community relations profile (immediate removals); and the community relations plan (immediate removals, planned removals, and remedial actions).

Chapters 2 and 3 of the handbook generally discuss these documents and suggest activities that might be included in community relations plans (CRPs). Chapter 5 explains EPA planning requirements in greater detail. The sample formats and plans that are presented below should further help EPA and state community relations staff to determine the scope and contents of these planning documents.

A. THE COMMUNITY RELATIONS PROFILE

The community relations profile -- a short form CRP -- must be prepared for any immediate removal action that lasts longer than 5 days. It must be submitted with the Immediate Removal Request (the "10 Point Document") and can later be incorporated into any immediate removal CRP. To ensure that the profile briefly explains how EPA intends to plan for and implement community relations activities at the site, community relations staff should use the profile format presented in Exhibit A-1. In preparing the profile, staff should answer the relevant questions listed in Exhibit A-2.

B. THE COMMUNITY RELATIONS PLAN

Community relations plans must be prepared for all Superfund-financed immediate removals lasting longer than 45 days and for all planned removal and remedial actions.

As described in Chapter 5, CRP requirements differ slightly, depending upon the nature of the response action. For example, as soon as it is evident that a removal action may last longer than 45 days, an immediate removal CRP must be prepared for the site. This CRP is less detailed than the CRP prepared for planned removal and remedial actions and is not necessarily based upon on-site discussions.

While the structure and contents of CRPs for planned removals and remedial actions are similar, the development process differs. A CRP covering the entire planned removal action must be submitted along with the "14 Point Contractual Document." For remedial actions, draft CRPs must be submitted with the draft Action Memorandum for federal-lead sites and with the draft cooperative agreement for state-lead sites. A complete CRP must be submitted: (1) for federal-lead sites, within four weeks of the submission of the draft Action Memorandum or prior to the initiation of the remedial investigation, whichever comes first; and (2) for state-lead sites, with the final cooperative agreement package. Plans must be revised prior to the initiation of site design and construction. The revised CRP should be submitted two weeks after the submission of the draft Record of Decision for federal-lead sites and with the draft amended cooperative agreement application for state-lead sites. Both the planned removal CRP and the remedial action CRP must be based upon an assessment of community concern developed after an on-site discussion.

The following sections suggest preferred ways to structure CRPs for immediate removals, planned removals, and remedial actions. A format for the immediate removal CRP and sample CRPs for planned removals and remedial actions are included.

1. CRPs for Immediate Removals

CRPs for immediate removals should include a succinct discussion of the site background, the nature of community concern, the key site issues, site-specific communications objectives, and activities to be undertaken at the site that are tied to the technical response schedule. Staff may incorporate the community relations profile into the plan as the background discussion and explanation of program objectives. There is no suggested length for immediate removal CRPs. As long as they clearly detail the program planned for the site, they may be brief.

In many cases it will not be feasible to conduct on-site discussions prior to preparing the immediate removal CRP. Community relations staff are encouraged, however, to conduct these discussions prior to preparing the plan whenever possible.

See Exhibit A-3 for a suggested format for immediate removal CRPs.

2. CRPs for Planned Removals and Remedial Actions

CRPs for planned removals and remedial actions must integrate community relations activities with technical milestones. Activities specified in these plans provide the community with vehicles for commenting on and providing input to technical decisions. The plans are written commitments to citizen participation on the part of EPA and the state.

Whether the plan is for a removal or remedial action, it must be designed to respond to the needs and concerns of the interested groups in the site community. These groups may differ in their values, favored response action, and intensity of concern. The communications techniques for providing information to these groups should be modified for the different audiences. For instance, the level of technical detail in a presentation to a group of engineering or science teachers would be very different from a presentation to a taxpayers organization. The local groups (to be identified in the community information interviews and/or telephone contacts) may include:

- Neighbors of the site;
- Local elected officials, political candidates, county or municipal boards, county health departments;
- Federal or state representatives and their staffs;
- Groups organized around the issues of the site;
- Existing civic groups: League of Women Voters, Kiwanis Club service clubs, church groups, taxpayer groups, farm organizations, senior citizen groups, minority groups;
- Local business groups,,Chamber of Commerce, real estate groups;
- Environmental groups, Audubon Society, Sierra Club;
- Health organizations, local American Cancer Society chapter;
- Officials or interest groups from nearby communities;
- Local industries and business;
- Labor unions; and
- Newspaper, radio, and television reporters, editors, talk show hosts.

Once the interested groups in a community and their concerns about the site are identified through on-site discussions and/or telephone contacts, the plan can be drafted.

The CRP includes the following elements that detail the community relations program at the site:

- Background and history of community involvement at the site:
  - -- Site history
  - -- Community involvement
  - -- Key issues;

- Specific objectives of the community relations program;
- Communications techniques to be used to meet specific objectives, including progress reports on past site work and reports on upcoming activities;
- Workplan and schedule that are tied to the technical response workplan and schedule;*
- Budget and staffing plan;*
- Appendix that lists affected and interested groups, individuals, and contractors, their affiliations, addresses, and telephone numbers;
- List of EPA, other federal agency, and state technical and community relations officials responsible for the site.

These elements are described in more detail below.

The opening paragraph of the CRP identifies the location of the release, the lead agency in the Superfund cleanup and in the community relations program, and the period of time covered by the plan.

The background and history section begins with a brief site history and information on cleanup plans, as well as an enforcement profile, if it is likely to alter the technical schedule. This section also describes the history of community involvement, including descriptions of interested groups, their activities, past public meetings, and other inquiries or displays of concern. The section concludes by summarizing the main public concerns and key issues that may affect the conduct of the cleanup. Concerns and issues likely to be raised in the future, as well as those raised in the past, are included.

The second major section of the CRP enumerates the specific objectives of the Superfund community relations program at the site. All Superfund community relations programs have two major goals:

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*For remedial actions, a detailed workplan, schedule, budget, and staffing plan need not be completed when the draft CRP is submitted as part of the draft Action Memorandum or the draft cooperative agreement. However, this detail must be added to the complete CRP. See Exhibit 4 for a suggested format for a draft CRP for remedial actions.

- **Provide accurate, timely information about the** response to the **community**; and
- **Allow citizens to express their concerns to EPA and the state.**

The purpose of this section of the CRP is to list specific objectives tailored to the technical response timing and the level of citizen concern at the site. Included in these objectives are the specific points that EPA and the state want to communicate to the community at certain points in the technical response, and the specific decisions on which local input is essential.

The community relations techniques section lists the communications activities to be conducted in each phase of the response and specific objectives. The section should explain how the community relations activities selected for the site are tied to the technical response workplan and schedule. The types of techniques that can be used in Superfund community relations programs are described in Chapter 4, but other techniques may be used as well, particularly activities that fit into ongoing local arrangements. As noted in Chapter 5, the CRP must specify that the community will have an opportunity to comment on the feasibility study prior to the selection of a site remedy. This section of the CRP must specify how a three week comment period will be implemented for nonexpedited remedial actions. For any initial remedial measures (IRMs), the plan must also (1) address how the community will receive prior notification of any site action and (2) state that a minimum two week comment period will be provided for any complex IRM recommended by a limited feasibility study. It should note that if there is a reasonable request for a comment period extension (e.g., because of delays in providing documents to citizens), community relations staff should extend the review period, as long as the delay does not exacerbate any threat to public health, welfare, or the environment.

This section should also detail how staff will keep citizens informed of past site activities and upcoming events on a regular basis. Where there is significant public interest, CRPs should provide for monthly fact sheets or progress reports on technical and community relations work. There should be provision for coordinating the community relations responsibilities of the federal, state, and local agencies, in addition to EPA, involved in the response.

The last two sections, the workplan and schedule, and the budget and staffing plan, consist of charts. The workplan and schedule display technical milestones and community relations activities along a time line. The time line may be altered over the course of the Superfund response because most activities will correspond to technical milestones, not dates. The community relations activities should include a period for lead time to draft, circulate, review, and approve written materials and activity plans before the date of the activity. The budget and staffing plan details the EPA, other federal, and state agency staff responsible for each community relations activity. The staffing list should differentiate preparatory staff -- those who draft materials and arrange appointments and meeting space -- from primary staff responsibilities, such as making a presentation, editing and approving a fact sheet, or running a workshop. The work hours for each person responsible for an aspect of an activity are included, along with any travel costs, material costs, or contractor costs, for each activity.

Finally, **an appendix of public officials, interested groups and individuals, contractors, and EPA, federal, or state staff responsible for the site is a standard part of a CRP**. Names of persons contacted during the community information interviews, as well as others referred to in the conversations, are listed with their affiliations, if any, addresses and telephone numbers. The appendix may be arranged under the headings of federal, state, and local officials and local groups.

To aid their understanding of how to develop CRPs, community relations staff should review the following samples of CRPs that have been approved by Headquarters: the CRP for Skiljan Residence (a planned removal action); and the CRP for the Imperial Sites, Imperial Missouri (remedial action). These plans were developed after site visits and community interviews, but do not necessarily reflect programs implemented at the sites. They are presented only as examples of the preferred CRP format.

EXHIBIT A-1

SUGGESTED FORMAT -- COMMUNITY RELATIONS PROFILE FOR IMMEDIATE REMOVALS

DATE PROFILE PREPARED:

A. BACKGROUND

1. Release information

Date and location of release and substances released:

Nature of the threat to public health, welfare, and the environment:

Response actions, if any, taken to date:

2. Key community concerns and issues

Concerns and issues identified by local officials and citizens:

Brief evaluation of the level of citizen concern:

Identification of interested local officials, citizens, and groups, their affiliation, addresses, and phone numbers:

Brief description of any media coverage; dates of media coverage; identification of media contacts:

Brief description of any actions taken by community members, or any meetings that have already been held by EPA or the state, elected officials, or citizens:

B. OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

List of specific objectives for the site and why these are selected:

Brief description of activities considered for the site (staff's preliminary view of what would constitute an effective program for the site) and how these activities would be tied into the technical response.

EXHIBIT A-2

BACKGROUND INFORMATION FOR PREPARING COMMUNITY RELATIONS PROFILES

A. BACKGROUND

1. Background of the Release

What is the location of the release; how was it identified?
What caused the release of hazardous substances?
What hazardous substances have been identified or are suspected to be present?
What is the nature of the threat posed by the release? threats to human health? the environment?
What immediate action is planned?
What actions have already been taken?
Are there restrictions on response actions imposed by local ordinances? By enforcement concerns?
Who is the responsible party? If none has been identified, what is the status of efforts to locate a responsible party?

2. Key Community Concerns and Issues

What are the primary concerns of the community? Effects of the release on personal/family health? Contamination of water supplies? Market value of homes or damage to property? Adverse impact on local businesses?
What are the concerns of individual citizens or groups?

3. History of Community Involvement

How have citizens viewed any EPA or state communications activities that have already taken place?
What coverage has been given by the media?

B. OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

1. Specific Objectives

What are the program's specific objectives? To provide the community with accurate, understandable information? To prepare the community for further action?

2. Planned Activities

What activities are planned for providing the community with information on a regular basis? For eliciting community needs and concerns?
Who is responsible for preparing the CRP and when will it be completed?

EXHIBIT A-3

SUGGESTED FORMAT -- COMMUNITY RELATIONS PLANS FOR IMMEDIATE REMOVALS

DATE PLAN PREPARED:

A. BACKGROUND OF RELEASE

1. Date of release and substances released
2. Nature of the threat to public health, welfare, and the environment
3. Response actions, if any, taken to date

B. KEY COMMUNITY CONCERNS AND ISSUES

1. Concerns and issues identified by local officials and citizens
2. Identification of interested local officials, citizens, and groups, their affiliation, addresses, and phone numbers
3. Brief description of any media coverage; media coverage date; identification of media contacts:
4. Description of actions taken by the community

C. OBJECTIVES FOR THE COMMUNITY RELATIONS PROGRAM

1. List of specific program objectives (e.g., to provide accurate, understandable information, to prepare the community for further action, to allay community concerns)
2. Explanation of why objectives have been selected (e.g., their targets, their relationship to the response action)

D. COMMUNITY RELATIONS ACTIVITIES

1. List of communication activities to be performed at the site; description of how they relate to program objectives; explanation of how community relations activities relate to the technical response schedule
2. Brief schedule of activities (specify date, activity, objective, staff, workhours)

E. STAFF

1. List of staff responsible for program implementation and their assignments

EXHIBIT A-4

SUGGESTED FORMAT -- DRAFT COMMUNITY RELATIONS PLAN

DATE PLAN PREPARED:

A. SITE BACKGROUND

1. Date of release and substances released
2. Nature of the threat to public health, welfare, and the environment
3. Response actions, if any, taken to date
4. Enforcement status

B. HISTORY OF COMMUNITY INVOLVEMENT

1. Descriptions of any past or ongoing community activities at the site
2. Concerns and issues identified by local officials and citizens
3. Brief evaluation of the level of citizen concern
4. Identification of interested local officials, citizens, and groups, their affiliations, addresses, and phone numbers
5. Brief description of any media coverage, dates of media coverage, and media contacts
6. Descriptions of any other inquiries or displays of concern

C. SITE-SPECIFIC COMMUNITY RELATIONS OBJECTIVES

1. List of specific objectives for the site and why these are selected
2. Brief description of activities considered for the site (staff's preliminary view of what would constitute an effective program for the site), and how these activities relate to the technical response schedule

D. IMMEDIATE COMMUNITY RELATIONS ACTIVITIES

Brief description of activities (if any) recommended prior to CRP approval

E. SCHEDULE FOR CRP COMPLETION

Brief list of dates and staff responsibilities

COMMUNITY RELATIONS PLAN

SAMPLE CRP

Skiljan Residence/Dial Services Manufacturing Company
Cleveland, Ohio

This community relations plan outlines activities to be conducted during a Superfund planned removal action at the Skiljan residence and the Dial Services Manufacturing Company, both being located in Cleveland, Ohio. Subject to finalization of the cooperative agreement between Ohio EPA and U.S. EPA, the Ohio Department of Health will have the lead responsibility working in close cooperation with U.S. EPA, Region V and Ohio EPA. This community relations plan can be updated and revised in response to events affecting the progress of the planned removal and/or citizens needs or concerns.

A. BACKGROUND AND KEY ISSUES

1. Site History

a. Skiljan residence
18028 Nottinghan Road
Cleveland, Ohio

On April 30, 1982, Mr. Eugene Skiljan discovered, in the course of demolishing a barbeque pit in his backyard, several hundred vials labeled "U.S. Radium" and "poison". Investigation by the Ohio Department of Health (ODH) Radiological Health Program, led to identification of the vials as spent containers possibly from Dial Services Manufacturing, a radium dial painting company founded by the former owner of Mr. Skiljan's residence, Mr. Walter Issel. Subsequent surveying identified several regions of radioactivity in the backyard and on an adjoining property, seepage off the property showing elevated radium-226 in the water and contamination in the basement of the home.

During the week of May 25-28, the Center for Applied Isotope Studies (CAIS) at the University of Georgia surveyed the property more fully for the State of Ohio and identified, in addition to the barbeque pit, nine areas requiring excavation to remove radium-226 contaminated soils.

b. Dial Services Manufacturing Company
1741 Rockwell Avenue
Cleveland, Ohio

Subsequent to the discovery of radium contamination on the Skiljan property, an investigation was conducted by the ODH, Radiological Health Program, of the building in downtown Cleveland, Ohio, where Dial Services Manufacturing formerly painted radium dials. The firm still exists but no longer utilizes radioactive materials. Less than a dozen employees are engaged to teflon coat small parts. The radioactive survey established that gamma and beta radiation levels were several times background throughout the building and that alpha contamination, fixed to surfaces and furniture, was extensive. Contaminated metal springs were found buried in the soil.. It was learned that a fire occurred in the radium dial painting operation, possibly about 1945, and that the building was rebuilt on the same site.

2. History of Community Concerns

a. Skiljan residence

Mr. and Mrs. Skiljan are the ones most affected by the contamination and are, of course, extremely concerned. Although there have been no organized groups formed, the local people are very aware of this site due to extensive media coverage and actions by Mr. and Mrs. Skiljan. The Skiljans erected a sign in their front yard identifying their home as the contaminated site and requesting help in getting it cleaned up. They also, very successfully, circulated petitions for signatures at a local street fair. They obtained approximately 5000 signatures backing them in their efforts. The two immediate neighbors, especially the family to the south are very upset. This property to the south has contaminated soil. The removal of this soil is provided for in the scope of work.

b. Dial Services Manufacturing Company

The operators of the Dial Services Manufacturing Company are concerned with present worker safety, bad publicity hurting their business and disruption of their business during clean up.

One business, Universal Pictures, located a block from Dial Services Manufacturing has expressed some concern about radiation contamination. Staff from ODH and the Cleveland City Dept. of Public Health and Welfare met with the employees and assured them that their building was sufficiently far way from the contaminated area.

Personnel from City Shelters of Cleveland, on the east side of Dial Services Manufacturing, have expressed concern, also. The building has been checked and levels of contamination were found to be within acceptable levels.

c. Health concerns

The Ohio Department of Health is concerned about former employees of Mr. Issel and Dial Services Manufacturing Company and immediate members of Mr. Issel's family. Appeals were made via the media for information on former employees with very little success. Information, including a form rquesting voluntary bioassays, has been delivered to surrounding homes and current employees. Ninty requests for the bioassay test have been received.

B. OBJECTIVES OF THE COMMUNITY RELATIONS PLAN

The objectives of the community relations program are:

1. To keep Dial Services Manufacturing, the Skiljans and immediate property owners apprised of the plan and time table for clean up.
2. To insure that citv officials especially interested in the sites be informed of plans, progress and any problems which may develop.
3. To keep interested state and Congressional legislators and state officials informed of plans and progress.
4. To insure that accurate information is disseminated to the media.

C. COMMUNITY RELATIONS TECHNIQUES

The following techniques are suggested to meet the objectives of this community relations plan:

Objective	Technique
1. Meetings with Dial Services Mfg., the Skiljans and immediate property owners.	To keep them informed of plans and progress. These can be one to one meetings rather than group meetings. As clean up starts, these will likely be on a day to day basis.
2. Meetings with city officials.	To inform interested city officials of the plans and progress. These should include meetings as preliminary plans are made, when the schedule is set, as any problems develop and when work is completed.
3. Briefings for state and Congressional legislators and state officials.	To keep these interested individuals informed of progress. These briefings can be oral or written.
4. Media conference.	To provide all concerned media with accurate information, an opportunity to tour the sites and question the contractor, state officials and city officials.

5. Press releases and fact sheets.	To provide for community wide dissemination of information regarding the progress and completion of clean up. This can be part of the media conferences unless there is sufficient reason to provide additional information.
6. Concluding report.	To provide a record of public involvement and instances of contact between ODH, OEPA and citizens or officials.

D. WORKPLAN AND SCHEDULE

	October	November	December
Meeting with city officials	X	X	X
Meeting with Dial Services, Skiljans, property owners	(weekly or daily as required)		
Briefings for state and Congressional legislators		X	X
Media conferences		X	X
Site tours		X	X
Media releases		X	X
Concluding report			X

E. BUDGET AND STAFFING PLAN FOR COMMUNITY RELATIONS PLAN

Activity	Staff Responsibility	Work hours
Meeting with city officials	Bob Quillin (ODH)	12
	Ben Wilmoth (ODH)	12
	Lorey Roggenkamp (OEPA)	3
Meetings with Dial Services, Skiljans, property owners	Bob Quillin (ODH)	20
	Ben Wilmoth (ODH)	20
	Lorey Roggenkamp (OEPA)	3
Briefings for state and Congressional legislators	Bob Quillin (ODH)	5
	Ben Wilmoth (ODH)	5
Media conference	Paul Massa (ODH)	20
	Bob Quillin (ODH)	15
	Bob Hardian (U.S.EPA)	5
	Ken Meckstroth (ODH)	15

Site tours	Paul Massa (ODH)	3
	Bob Quillin (ODH)	3
Media releases	Ken Meckstroth (ODH)	10
Concluding report	Lorey Roggenkamp (OEPA)	10

F. OFFICIALS, CITIZENS, MEDIA

Local Officials

Federal Officials

State Officials

Concerned Citizens and Property Owners

Media

COMMUNITY RELATIONS PLAN
FOR REMEDIAL ACTION
AT THE IMPERIAL SITES
IMPERIAL, MISSOURI

(June 1983)

This Stage I community relations plan outlines the activities to be conducted during a Superfund remedial action at the Imperial sites in Jefferson County, Missouri. U.S. EPA Region VII has the lead responsibility for managing the remedial action, which consists of initial remedial measures, a remedial investigation, and a feasibility study. This plan was prepared in February 1983 and revised in June 1983.

I. BACKGROUND AND HISTORY

A. SITE HISTORY

Imperial, Missouri, a suburb of St. Louis, is an unincorporated town of about 6,000 middle-income families. The dioxin sites located in Imperial are nestled in a hilly, wooded area that is still being developed.

In February 1971, a salvage oil company owned by a Mr. Russell Bliss began hauling dioxin wastes from the now defunct Northeastern Pharmaceutical and Chemical Company (NEPACCO) in Verona, Missouri. The type of dioxin, scientifically named 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD), is an unwanted byproduct resulting from the manufacture of trichlorophenol, which was produced by NEPACCO as an intermediate in the manufacture of hexachlorophene.

The dioxin-contaminated wastes were mixed with waste oils and used to spray at least three horse arenas for weed and dust control. One of these arenas was at Bubbling Springs Ranch in Jefferson County. It was sprayed with contaminated oil in June and July 1971. Early in 1972, two horses died, and later in the year four more died. At the time, the cause of death was undetermined. As a precaution, however, 850 yards of arena soil was excavated in March 1973.

The excavated soil from Bubbling Springs Ranch was used as residential fill at the Minker residence and the Stout site (named after the contractor who did the excavation and who owned the property at the time). Approximately 20 truckloads of the soil were used to fill a steep ravine on the south end of the Minker house. The property is located on a ridge at the head of the watershed, and the fill area has mostly washed out into Romaine Creek. The Stout property is on the side of a ridge, and the contaminated soil was used to level off an area underneath two house trailers.

EPA first sampled the Imperial sites where the contaminated material had been used for residential fill in May 1982. On August 18, 1982, results from this limited sampling confirmed dioxin contamination. A more comprehensive sampling effort was conducted in October to determine the extent of contamination.

In November, results from the October sampling showed no contamination above 1 ppb from the Country Club subdivision. Five of the 53 samples taken at the Stout property had positive results (above 1 ppb); these ranged from 1.5 ppb to 22.2 ppb, the latter occurring at a depth of 10 feet.

The highest levels of dioxin contamination in the area were found in fill material at the Minker residence and down the slope behind the house. Of the 95 samples, 40 had positive results. The highest concentration found was 301 ppb.

In Romaine Creek, 78 of the 151 samples showed positive results. Concentrations of dioxin in sediments were highest (272 ppb) where drainage from the Minker property enters the creek. The concentration decreased to about 90 ppb 800 feet downstream, 10 ppb 2,000 feet downstream, and below 1 ppb 6,000 feet downstream.

Samples of dust from vacuum cleaner bags were collected from five area houses. Dioxin contamination was found only in the sample from the Minker residence, at 3.6 ppb.

Using these findings, risk assessments were prepared and were evaluated by EPA, CDC, and the State of Missouri. These three groups determined that six households with potential daily exposure through contact with the soil should be relocated. These households are identified in section I-C of this plan.

At the request of residents, additional sampling from households adjacent to the six relocatees was conducted in December 1982. Results are not yet available.

B. COMMUNITY RELATIONS HISTORY

The following community relations activities have been conducted by EPA to date. Community issues, concerns, and participants are discussed in sections C and D, below.

May and June 1982: At the time of the first EPA sampling, engineers made door-to-door visits to talk with residents whose property was being sampled.

October 6 and 7, 1982: EPA staff toured the area and visited four households near the Minker site (staff could not contact two other households near the site) and one household near the Stout site.

October 6, 1982: A phone line to EPA was opened; from October to the present, approximately 30 residents have called EPA.

October 14, 1982: A public meeting was held at Mermac Heights Elementary School. Approximately 150 households in the vicinity of the sites were invited. About 175 persons attended. There was heavy press coverage and attendance by local and state officials. A fact sheet was distributed.

November 5, 1982: Dioxin Update No. 1 (stating the status of October sampling) was sent to approximately 150 households in the vicinity.

December 7, 1982: EPA and CDC made personal visits to the six households identified for relocation. Dioxin Update #2 was distributed door-to-door to approximately 150 families. This included October sampling results, maps of the sites that were sampled, action options, future plans, and notice of a public inquiry center.

December 8, 1982: A public inquiry center was opened at a nearby hotel for 5 days, 9 a.m. to 9 p.m. A press conference and news release presented the findings from the October sampling.

January 20, 1983: A spokesman for concerned citizens near the Minker site requested a meeting between residents and responsible officials. Forty-two citizens attended, as well as representatives from EPA, CDC, Missouri Division of Health, Missouri Department of Natural Resources, and a State of Missouri attorney. There was no press attendance. Remedial actions and citizen concerns were discussed. Handouts included a fact sheet, dioxin questions and answers, and a summary sheet of proposed actions.

January 29, 1983: A public hearing was held at Jefferson College in Hillsboro, called by Congressman Robert Gephardt. This was a general meeting concerning possible dioxin sites throughout Missouri. Meeting participants included: Regional and Headquarters EPA officials; FEMA; CDC; Missouri DNR and Health Division; State Senator Harriet Woods; State Representative Bob Feigenbaum; Dr. Ellen Silbergeld (Environmental Defense Fund); and representatives from the Minker site, Stout site, Country Club Manor, Times Beach, and Warren County. Media coverage was heavy. Informational handouts were distributed by EPA. The Coalition for the Environment (see Section C below) also distributed its February "Alert Newsletter."

C. KEY PARTICIPANTS

1. At the most general level, there are approximately 150 households in the vicinity of the sites. They will be kept informed of major activities and findings. Several families have voluntarily moved out of the area because of their concerns.

2. Two primary organized groups have been identified. Personal contact will be maintained with these groups through their spokespersons.

   a. Country Club Manor; Gail Hanks, spokeswoman. About eight families, well-researched, actively involved. Chief concern is health effects from possible runoff from the Stout site. (See Section D for further discussion of issues.)

   b. West Rock Creek Hill; Mr. Abrahamson and Mr. Webb, spokesmen. Dennis Lynch is also a participant who attended the January 29 meeting called by Congressman Gephardt. About 12 families are involved, and have expressed concerns about health effects and economic impacts (property values, medical bills).

3. Eight households nearest the Minker site have been offered relocation:

   a. Harold Minker household--two adults, one child. They have temporarily relocated.

   b. John Vickers household--two adults, three children. This is the first household downslope from the fill area. They have been temporarily relocated.

   c. George McArthy household--two adults. They are in direct line of fill area drainage, immediately below the Vickers house.

   d. Dennis Lynch household--two adults, two children.

   e. Doug Keane household--this is a rental property that is currently vacant.

f. James Haeger household--two adults. Next door neighbors to Minkers on W. Rock Creek Road.

g. Joseph Korenak household--first house south of Minker residence, on west side of Rock Creek Road.

h. Albert Edwards household--located immediately adjacent to Romaine Creek, approximately 1/3 mile north of the Minker site.

4. Personal contact will be maintained with ~~five~~ eight households adjacent to the seven identified for relocation:

    - Crismon
    - Davis
    - Abramson
    - Henderson
    - Webb

5. Three households near the Stout site have been offered relocation:

    - Martin Hutchison (next door to site; have already temporarily relocated)
    - James Cisco (2 doors down from site; have already temporarily relocated)
    - Edward Baczynski (across street; have already temporarily relocated)

6. Personal contact will be maintained with two households near the Stout site that have expressed concerns:

    - Jack Sutton (owns trailer house on Stout site; is the developer--NHI Development Company--of Country Club Manor subdivision)
    - Peter Vogt (owns part of Stout site; lives further up the road)

7. Other areawide groups that are involved in the dioxin situation in Missouri are:

    - Coalition for the Environment (based in St. Louis; present at January 29 meeting)
    - Missourians against Hazardous Waste (based in Excello, Missouri)
    - Environmental Defense Group (based in Washington, D.C.; Dr. Ellen Silbergeld attended January 29 meeting)

- Sharon Rogers--attended January 29 meeting as a representative of the people of Warren County (where Bob's Home Service, the only licensed hazardous waste landfill in Missouri, is located)

- Mr. Layne Jumper--Times Beach site representative who attended the January 29 meeting.

8. The local and national press has been giving extensive coverage to events at these sites.

9. Local, state, and Federal officials: Congressman Gephardt has been actively involved in this issue, and has been contacted by a number of residents. He called the public hearing on January 29, 1983. State representative Bob Feigenbaum and State Senator Harriet Woods have also been particularly involved in dioxin and hazardous waste issues in Missouri.

D. KEY ISSUES AND CONCERNS

1. Health Effects. What tests can be taken? Who will pay for tests and medical expenses? What are the effects of exposure?

2. Property Values. How can compensation be received for lower property values? How are Federal enforcement actions related to residents' legal position? Can property taxes be reduced to reflect lower value? After cleanup, can property deeds state that the area is clean and safe? What will be the effects on local developers?

3. Additional Sampling. What are the results of the December samplings? Some people have requested that their property should also be sampled. Some residents believe that wellwater sampling should be conducted, and that sampling should be done for PCBs and other possible toxic substances.

4. Relocation. Some residents living downwind from the sites believe they should be relocated immediately because they are subject to exposure. Will relocation of some households be necessary during cleanup? What are the details of the relocation and fencing process (insurance, fire-fighting access, security)?

5. Remedial Action and Cleanup: What is the schedule for remedial actions and cleanup? What will the level of cleanup be? How will citizens be involved in selecting remedial alternatives? Will con-

taminated soil be contained onsite or removed? What will the restoration and close-out procedures be? There is a strong feeling by some people that containing and securing the site is not an adequate cleanup measure; if this solution is chosen, they will insist on being bought out on the basis of lowered property values and future health risks. If soil is removed, will the truck traffic cause road deterioration? What traffic controls will be provided? How will equipment used during the cleanup be decontaminated? How will residents be protected from dust? Can downwind residents be relocated during on-site action?

It should be emphasized that people's two main concerns are health effects and economic loss. It is perhaps relevant to note that in August 1982, a Federal court awarded over $58 million in damages to workers whose health was affected by exposure to dioxin during the cleanup of a 1979 train derailment in Sturgeon, Missouri. Several residents in the Imperial area have filed suit for damages, and more litigation is expected.

Based on the issues, concerns, and citizen participation and perceptions that have been identified, the level of community concern at the Imperial sites should be assessed as high.

E. PROPOSED REMEDIAL ACTIONS AND SCHEDULE

The activities described below will be conducted pursuant to a written contract between EPA and the State of Missouri. That contract defines the responsibilities of EPA and the State and provides for funding of the proposed actions. EPA is the lead agency and will be responsible for performing all activities at the site other than the relocation of the residents.

- Initial Remedial Measures - Temporary relocation will be offered to affected residents by the State of Missouri. EPA contractors will post warning signs around the Minker and Stout residential areas and along Romaine Creek. Before the posting, access agreements will be obtained from property owners and surveys of the area will be conducted.

- Remedial Investigations - Additional data will be collected. Aerial photographs of the area will be taken to prepare topographic maps. Additional soil samples from the Stout residential area will be collected and analyzed to accurately define the contaminated area. A hydrogeological study of

Romaine Creek will be conducted by the U.S. Geological Survey to provide information about the geology and groundwater in the area. At this time, no additional sampling is planned for the Minker area or Romaine Creek.

- Feasibility Study - A preliminary screening of alternatives will be conducted to arrive at a permanent remedy based on costs, environmental effects, environmental protection, and engineering feasibility. A more detailed evaluation will then be made of those alternatives which appear feasible. A selection of the most appropriate site-specific alternative will then be made. Citizen input will be solicited before the selection of the final remedy.

II. OBJECTIVES OF THE COMMUNITY RELATIONS PLAN

1. Ensure that local residents and state and local officials are kept informed of possible actions under consideration and the reasons for these actions.

2. Ensure that local residents, state and local officials, and concerned groups are notified of major findings, activities, and decisions in a timely and effective way. Notify residents and officials before notice is given to the media.

3. Provide the media with timely, detailed, accurate information about the initial response, remedial investigation, and feasibility study.

4. Effectively address citizen inquiries and concerns; ensure that the best possible information is provided. Provide a central, consistent source(s) for people to contact.

5. Provide local residents and state and local officials with the opportunity to comment on remedial action alternatives identified during the feasibility study, before final selection of a remedy.

6. Use identified public concerns as one criterion for the evaluation of alternatives during the feasibility study.

7. Keep aware of changes in community concerns, information needs, and activities, and modify this community relations plan as necessary to address these changes.

III. TECHNIQUES TO BE USED TO MEET OBJECTIVES

The following community relations techniques fulfill the objectives listed above. The purpose of each technique and its application at certain stages of the technical work are discussed. The workplan and schedule shown in Section IV shows these community relations techniques in relation to technical milestones.

Technique	Objectives
1. Personal contact with residents	Door-to-door or by telephone. To inform target residents (relocatees; spokespersons for two community groups; closest neighbors) of major findings, activities, and decisions. Should occur before fact sheets or other public information is released.
2. Briefing of local and state officials	In person or by telephone. Inform appropriate officials of plans and developments on continuing basis. CIGL will maintain liaison with public officials.
3. Public consultations	Informal discussions with small groups of concerned citizens (two identified groups and any others that arise) to review issues and answer questions. Provide medical experts or other experts as appropriate. Schedule during the feasibility study to present the alternatives and solicit input; also schedule upon request.

Technique	Objectives
4. Fact sheets and updates	To be distributed to 150 households in vicinity as a source of accurate information concerning findings, plans, activities. Also to be distributed at meetings and consultations, to the media, and to other appropriate parties (such as active environmental groups). Ensure that fact sheets are mailed to residents who have moved from the area because of the dioxin situation. Coordinate distribution with other information releases. Invite comments and provide further sources of information where appropriate.
5. Press releases	To announce milestones in activities or impart necessary information. Will be concise, timely, and accurate. Dates of release will be strategically planned so release doesn't precede appropriate local notification.
6. Press conferences (optional)	To announce important findings or actions. High-level state and Federal officials may participate. Could be conducted after remedial action plan is approved and prior to construction.
7. Health advisory number (Dioxin Program, St. Joseph Hospital, St. Louis--sponsored by CDC/Missouri Department of Health)	To gather and provide information about health concerns of public. Number should be included in fact sheets or otherwise be made known to local residents and officials.

Technique	Objectives
8. EPA toll-free telephone line (Office of Public Affairs, EPA Region VII, Kansas City)	(Office To provide a direct line of communication for inquiries and concerns. Number should be included in fact sheets or otherwise be made known to local residents and officials.
9. Onsite inquiry office (optional)	To provide an onsite source of information when controversial findings are released or when a great deal of public interest is anticipated.
10. Regional information office (optional, for St. Louis region)	To provide information about this and other dioxin sites; to provide personal, easily accessible, and consistent contact to concerned citizens.
11. Summary of public concerns	For use by EPA staff during feasibility study; public concerns are to be used as one criterion for the evaluation of alternatives.
12. Interim report	To provide EPA Headquarters with a summary of public inquiries and concerns, the responses provided, and the community relations activities conducted.

IV. WORKPLAN AND SCHEDULE*

<table>
<tr><th rowspan="2">Community Relations Techniques</th><th colspan="5">Technical Milestones</th></tr>
<tr><th>Release of December Sampling Results</th><th>Posting of Sites</th><th>Remedial Investigation</th><th>Evaluation of Feasible Alternatives</th><th>Selection of Remedy</th></tr>
<tr><td>1. Personal contact with residents</td><td>●</td><td>●</td><td>●</td><td>●</td><td>●</td></tr>
<tr><td>2. Briefing of local/state officials</td><td colspan="5">(ongoing)</td></tr>
<tr><td>3. Public consultations</td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>4. Fact sheets and updates</td><td></td><td></td><td></td><td>●</td><td></td></tr>
<tr><td>5. Press releases</td><td>●</td><td>●</td><td>●</td><td>●</td><td>●</td></tr>
<tr><td rowspan="2">6. Press conferences</td><td></td><td>●</td><td>●</td><td>●</td><td>●</td></tr>
<tr><td colspan="5">(optional, as appropriate)</td></tr>
<tr><td>7. Health advisory number</td><td colspan="5">(ongoing)</td></tr>
<tr><td>8. EPA telephone line</td><td colspan="5">(ongoing)</td></tr>
<tr><td>9. Onsite inquiry office</td><td colspan="5">(optional, as appropriate)</td></tr>
<tr><td>10. Regional information office</td><td colspan="5">(optional, as appropriate)</td></tr>
<tr><td>11. Summary of public concerns</td><td></td><td></td><td></td><td>●</td><td></td></tr>
<tr><td>12. Interim report</td><td></td><td></td><td></td><td></td><td>●</td></tr>
</table>

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*The schedule presented here is relative to technical milestones; the actual timing can be specified when the technical work schedule is made final.

V. BUDGET AND STAFFING PLAN

(To be provided by EPA)

APPENDIX: NOTIFICATION LIST (Available upon request)

A. Local officials
B. Interested or affected parties and organizations
C. Media

APPENDIX B

COMMUNITY RELATIONS GUIDANCE FOR EVALUATING CITIZEN CONCERNS AT SUPERFUND SITES

1. INTRODUCTION

This document provides guidance for planning, conducting, and evaluating on-site discussions with concerned citizens and local officials at Superfund sites. These discussions provide the basis for assessing the nature and level of citizen concern at the site -- a requirement for all non-emergency Superfund response actions. Tasks described in this guidance may be performed by EPA regional personnel, state response staff, or EPA-supervised contractors.

Community relations activities must be based upon information derived from on-site discussions with concerned citizens and local public officials to ensure that EPA or the state responds to local concerns and major issues. Results of the on-site discussions should be incorporated into a community relations plan (CRP) -- the planning, management, and budget cornerstone of the community relations program for each site. Activities specified in the CRP are tailored to the level and nature of community concerns at the site.

These on-site discussions are not a survey of citizen opinion. Rather, they are information meetings conducted to provide community relations staff with the background information necessary to understand the site's history from the community's perspective, to identify concerned citizens, officials, and organized groups, and to evaluate the level and nature of citizen concern. This information is indispensable in preparing the CRP. The discussions also serve as the initial public input into response plans Concerns identified in these discussions may be taken into account in developing technical response actions.

Information derived from on-site discussions may also be useful to the enforcement staff. At sites where enforcement staff are seeking responsible party cleanup, on-site discussions should be conducted and evaluated by the time notice letters are sent out, so that enforcement personnel may be informed of community concerns before entering negotiations with responsible parties.

Thus, these discussions are of critical importance in designing community relations programs that are tailored to a particular community. In turn, they can help in the design and implementation of response actions (including enforcement actions) that meet the community's special needs. They must, however, be conducted with care and discretion.

Section 2 of this document describes how to plan and prepare for on-site discussions. Section 3 offers a set of procedures that may be useful for conducting the discussions. Finally, Section 4 provides a framework for assessing the results of the discussions.

2. PLANNING AND PREPARATION

This section of the guidance discusses the planning and preparation that should precede discussions with citizens and local officials at the site. The work effort required for the activities described will vary from site to site, depending on the level of citizen concern and the site's technical complexity. On the average, however, planning and preparation for on-site discussions should require three days of work effort.

Prior to conducting the on-site discussions, the community relations staff should plan: (1) how to acquire information about the site and identify interested public officials and members of the local community; (2) how to contact interested officials, citizens, and organized groups; and (3) how to elicit information from these individuals and groups. These three phases of the planning process are discussed separately below.

A. Acquiring Site Information and Identifying Interested Officials, Community Members, and Groups

To ensure that key individuals are contacted and that site issues are understood, certain steps should be performed to acquire necessary background information, including the following:

(1) Meeting with regional EPA and state technical staff to discuss known or suspected site problems, to identify interested officials and citizens, and to obtain other background information;

(2) Reviewing EPA regional office, headquarters and state files to obtain relevant memos, documents, and correspondence;

(3) Researching local newpaper articles for the names of community leaders and for a preliminary indication of major site issues;

(4) If EPA clearance has been obtained, contacting Congressional offices in Washington or the state, either by telephone or in person, to obtain additional background information, as well as to inform the offices that EPA or state staff or contractors will soon visit the site. Congressional staff can identify the most involved citizens and the major site issues on the basis of inquiries to their office. It is essential to obtain EPA clearance, however, before making such contact. (Staff in the local or district Congressional office nearest to the site may be included routinely among those with whom on-site discussions are held, as noted below.)

Performing these four steps in the order in which they are presented here should help maximize the efficiency with which this first phase of the planning process is carried out.

At most sites, some or all of the following types of individuals and groups may have concerns about the site or can provide valuable perspective on site issues. They should, therefore, be included among those to be considered for on-site discussions:

- Persons interested in the site, i.e., persons living in close proximity to the site and nearby property owners;
- State agency staff, such as health, environmental protection, or natural resources department officials;
- Local and state elected officials, such as the mayor, council members, local state legislators, or attorney general;
- Staff at Congressional or state legislators' district offices;
- County planning and health officials;
- Representatives of ad hoc citizen groups organized because of site issues;
- Local business representatives (e.g., from the Chamber of Commerce);
- Local civic groups;
- Neighborhood associations;
- Local chapters of environmental groups;
- Local educators and school administrators; and
- Media representatives.

It is important to encourage those members of the community who have been the most active with respect to the site to raise their concerns in on-site discussions.

B. Contacting Interested Officials, Citizens, and Groups

Once the background activities of the first phase of the planning process are completed, community relations staff should draw up a list of persons to be contacted at the site and make arrangements to meet with them. In phoning those persons on the contact list, staff should explain that the purpose of the discussions is solely to obtain the views of community members on site problems and to explore the concerns and issues identified by citizens and local officials. Staff should stress that the discussions will not be used to provide information to the public about site problems or possible future site actions, but instead, that the purpose of the discussions is to assess the level and nature of community concerns, so that community relations activities appropriate to those concerns can be conducted and so that community concerns can be taken into account in planning response actions. The purpose of the discussions will usually be easily understood. Citizens and officials will generally not object to speaking to government staff who cannot provide them with findings on possible effects or a firm schedule for cleanup, although they may be disappointed not to receive such information. Rather, citizens and local officials are generally appreciative that someone from the government is willing to meet with them and listen to their views. They regard the discussions as an opportunity to voice their concerns and, perhaps, to have some effect on government decisions.

If possible, all meetings should,be scheduled over a period of no more than five days.

C. Eliciting Information from Individuals and Groups

The final phase of the planning process is to draw up a brief and informal list of questions to guide the discussions with local officials and citizens. Such a list may help to ensure that the discussions are efficient yet comprehensive. These questions may serve as a reminder of the areas that should be covered in the discussions, the kinds of information that should be elicited, and any specific points that must be addressed. Because the on-site discussions should not be conducted as a survey, the questions listed in advance while planning the discussions need not be asked explicitly during discussions. Exhibit 1 presents examples of questions that may be useful in conducting on-site discussions.

In addition to preparing questions, community relations staff should determine whether there are any special matters that should not be publicly disclosed (for example, specific findings from enforcement investigations or preliminary cost estimates for cleanup). Program and enforcement staff should be consulted on this point before the on-site discussions are held.

EXHIBIT 1

EXAMPLES OF QUESTIONS TO ASK IN ON-SITE DISCUSSIONS

(1) When did you first become aware of the release of hazardous substances at the site?

(2) How would you characterize the problems at the site?

(3) What contacts have you had with local, state, EPA and other officials about the site?

(4) What are your major concerns related to the site?

(5) What activities have you participated in, sponsored, or organized concerning the site?

(6) How can EPA or the state best provide you with information concerning response activities? Would you like to be included on a mailing list?

(7) What kind of information would be most useful to you (e.g., technical information, status reports on cleanup activities)? How frequently would you like to receive a progress report or fact sheet?

(8) Is there anything you wish to mention that we have not yet discussed?

(9) Can you suggest other individuals or groups that EPA or the state should contact for additional information or to identify other types of concerns?

3. CONDUCTING ON-SITE DISCUSSIONS

This section presents procedures that may be useful to EPA, the state, or contractor support staff in conducting on-site discussions with citizens and local officials. If possible, all discussions related to a specific site should be conducted within a five day period.

Once the discussions have begun, staff should try to:

- Make all appointments as scheduled;
- Arrange a follow-up conversation if additional time is needed with any official or citizen;
- Assure citizens and officials that all interviews will be held confidential, and that no specific statements will be attributed to any person without prior clearance;
- Have two community relations staffers present during the discussion, when possible, so that one can take notes while the other leads the discussion.

About 45 minutes to one hour should be allowed for a discussion with an individual. Less time will usually be required once the community relations staff have become familiar with the background of community involvement through previous discussions. If asked, staff should not hesitate to identify some of the other citizens or officials with whom discussions are being held.

Local reporters may, on occasion, ask to attend discussions between community relations staff and community leaders or officials. The attendance of reporters at these discussions should be discouraged, as it might inhibit a frank and open conversation. Reporters should be asked, instead, to meet separately with community relations staff. If they do attend discussions with officials, they should be included in the meeting and asked for their views and comments, which are valuable.

At the outset of any discussion with reporters, community relations staff should repeat that the purpose of the discussion is to collect information, not to answer questions, and that the community relations staff are not in a position, in any event, to provide new information on site problems or response plans.

Community relations staff must take special care to avoid making subjective comments about the site during the discussions and avoid conveying specific information that may raise citizens' or officials' expectations about response activities.

At the end of each discussion, staff should ask the citizen or official if he or she is interested in participating in future briefings, workshops, and meetings, and receiving prior notification of such activities by mail. In addition, the names of other individuals to contact in the community should be requested. After each discussion has been concluded, staff should write up a summary of the discussion as soon as possible.

When all the meetings have been held, staff should prepare a final list of all interested officials and citizens with pertinent titles and affiliations, addresses, and phone numbers. This list eventually will be included in the community relations plan for the site.

4. EVALUATING DISCUSSIONS

Based upon the discussion summaries and the notes from each meeting, community relations staff should evaluate the nature and level of citizen concern at the site. This evaluation will be incorporated into the CRP.

Community relations staff may assess whether community concern is high, medium, or low by considering the presence or absence of the following six characteristics, which have been found to be important indicators of community involvement and concern in past on-site investigations conducted by EPA:

(1) Children's health -- whether families in the community believe their children's health may be affected by hazardous substances;

(2) Economic loss -- whether local homeowners or businesses believe that, the site has caused or will cause them economic loss;

(3) Agency credibility -- whether the performance and statements of EPA and the state are viewed by the public as competent and credible;

(4) Involvement -- whether an active, vocal group leader (or leaders) has emerged from the community and whether the group leader has a substantial local following;

(5) Media -- whether events at the site have received substantial coverage by local, state, regional, or national media; and

(6) Number affected -- whether more than three or four households perceive themselves as affected by the site.

Some of these characteristics are more important than others in determining the level of community concern. For example, a perceived threat to children's health is a particularly strong indicator of a potentially high level of citizen concern at a site. If several of the above characteristics describe the affected community, the community relations staff have grounds for considering that the level of community concern at the site may be medium to high or has the potential to become medium to high.

In writing CRPs, following completion of these on-site discussions, it is important to maintain objectivity. Consideration should be given to the feelings of any citizens or officials mentioned. These plans will be circulated among the state and federal agencies involved in the response. They may also be read by members of the general public in the site community. Allegations or opinions expressed by those with whom discussions were held do not need to be presented in the plans unless they are directly relevant to the design of a community relations program. Descriptions of the personal backgrounds or political beliefs of individuals are unnecessary. Accusations of conflict of interest or of a complete absence of credibility among certain officials or agencies are serious charges that are not appropriate subjects for CRPs. Such charges should be directed to the proper EPA or state staff according to the standard procedures in such cases. In short, the information gathered in the on-site discussions should be carefully weighed and presented as objectively as possible. No CRP should become an issue itself in the community.

By planning, conducting, and evaluating the discussions in accordance with this guidance, community relations staff should gain a clear understanding of the level and nature of community concern at a site. Community relations staff should then be able to prepare an effective CRP and to tailor communications activities at a site to the needs and concerns of local citizens and officials.

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APPENDIX C

THE QUARTERLY REPORT

INSTRUCTIONS FOR PREPARING QUARTERLY REPORT*

The quarterly report consists of: completed questionnaires on community relations activities at Superfund sites; written materials prepared during the quarter on activities at Superfund sites; and suggestions for improvements in the Superfund community relations program. Please follow these instructions in preparing the report.

1. Fill out a questionnaire for each removal or remedial site for which Superfund funding has been approved. Complete the questionnaire for both EPA-lead and state-lead actions. Use separate pages if necessary.

2. Provide information only on community relations activities that took place during the quarter.

3. Attach to the completed questionnaires any written materials (fact sheets, news releases, briefings, progress reports) prepared during the quarter for these sites.

4. Attach to the report any recommendations for improvements in the community relations program, including any recommendations for revisions in the community relations policy, handbook, or other guidance documents.

5. Submit report by January 15, April 15, July 15, and October 15 for the preceding quarter to:

   Daphne Gemmill
   Office of Emergency and Remedial Response (WH-548-D)
   Environmental Protection Agency
   401 M Street, S.W.
   Washington, D.C. 20460

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*Report should be prepared by the Region's Superfund Community Relations Coordinator, in coordination with the Regional Site Project Officers.

QUARTERLY REPORT QUESTIONNAIRE

1. Site/location:

2. Describe any changes in site issues (economic, social, technical, scientific, political) that have occurred since the preparation of the last quarterly report:

3. Describe the community relations activities undertaken during the previous quarter, their effects, and the concerns that arose. What issues remain?

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4. Describe community relations activities planned for the next quarter, how they will address outstanding issues, and how they relate to technical or enforcement activities conducted at the site: ______

5. If the feasibility study for a remedial action site will be available for public comment during the next quarter, describe how a comment period will be implemented and what activities community relations staff will undertake during the comment period to assist the local community's review of the study: ______

6. Describe any community relations issues anticipated for the next quarter: ______

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7. Does the CRP currently address these issues? Do you plan to revise the CRP? ______

8. Explain any deviations from the CRP for the site during the past quarter? ______

9. Would you like OPPM community relations staff or contractors to assist you in meeting certain needs during the next quarter or in resolving particular issues? ______

SITE REPORT PREPARED BY: ______

DATE: ______

APPENDIX D

Superfund Coordinators
Superfund Community Relations Coordinators
(September 1983)

Region One

John Hackler, Superfund Coordinator
Waste Management Division
EPA - Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203
FTS 8-223-5709 or (617) 223-5709

David Pickman, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203
FTS 8-223-5752 or (617) 223-5752

Region Two

Robert Ogg, Superfund Coordinator
Air and Waste Management Division
EPA - Region II
26 Federal Plaza
New York, New York 10278
FTS 8-264-2647 or (212) 264-2647

Lillian Johnson, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region II
26 Federal Plaza
New York, New York 10278
FTS 8-264-4534 or (212) 264-4534

Region Three

Ed Skernolis, Superfund Coordinator
Air and Waste Management Division
EPA - Region III
Curtis Building
6th and Walnut Streets
Philadelphia, Pennsylvania 19106
FTS 8-597-9100 or (215) 597-9100

Joe Donovan, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region III
Curtis Building
6th and Walnut Streets
Philadelphia, Pennsylvania 19106
FTS 8-597-9905 or (215) 597-9905

Region Four

Al Smith, Superfund Coordinator
Air and Waste Management Division
EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
FTS 8-257-3931 or (404) 881-3931

Gordon Kenna, Superfund
Community Relations Coodinator
Office of Public Affairs
EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
FTS 8-257-3004 or (404) 881-3004

Region Five

Richard Bartelt, Chief, Superfund Coordinator/
Oil & Hazardous Materials Coordinator
Remedial Response Branch
EPA - Region V
230 South Dearborn
Chicago, Illinois 60604
FTS 8-353-9773 or (312) 353-9773

John Perrecone, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region V
230 South Dearborn
Chicago, Illinois 60604
FTS 8-886-6874 or (312) 886-6874

Region Six

William Hathaway, Superfund Coordinator
Deputy, Air and Waste Management Division
EPA - Region VI
First International Building
1201 Elm Street
Dallas, Texas 75270
FTS 8-729-9709 or (214) 767-9709

Betty Williamson, Superfund
Community Relations Coordinator
Congressional and Intergovernmental Liaison
EPA - Region VI
First International Building
1201 Elm Street
Dallas, Texas 75270
FTS 8-729-9986 or (214) 767-9986

Region Seven

David Wagoner, Director/Superfund Coordinator
Air and Waste Management Division
EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106
FTS 8-758-6529 or (816) 374-6529

Rowena Michaels, Director
Office of Public Affairs
EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106
FTS 8-758-5894 or (816) 374-5894

Steve Wurtz, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106
FTS 8-758-5894 or (816) 374-5894

Region Eight

John Wardell, Superfund Coordinator
Air and Waste Management Division
EPA - Region VIII
1860 Lincoln Street
Denver, Colorado 80095
FTS 8-327-6238 or (303) 837-6238

Judy Herb, Director
Office of Public Affairs
EPA - Region VIII
1860 Lincoln Street
Denver, Colorado 80095
FTS 8-327-5927 or (303) 837-5927

Jane Russo, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region VIII
1860 Lincoln Street
Denver, Colorado 80095
FTS 8-327-5927 or (303) 837-5927

Region Nine

Harry Seraydarian, Superfund Coordinator
Director, Toxics and Waste Management Division
EPA - Region IX
215 Fremont Street
San Francisco, California 94105
FTS 8-454-7460 or (415) 974-7460

Steve Drew, Superfund
Community Relations Coordinator
Toxics and Waste Management Division
EPA - Region IX
215 Fremont Street
San Francisco, California 94105
FTS 8-454-8026 or (415) 974-8026

Region Ten

Chuck Findley, Superfund Coordinator
Air and Waste Division
EPA - Region X
1200 6th Avenue
Seattle, Washington 98101
FTS 8-399-1918 or (206) 442-1918

Deborah Yamamoto, Superfund
Community Relations Coordinator
Air and Waste Division
EPA - Region X
1200 6th Avenue
Seattle, Washington 98101
FTS 8-399-0455 or (206) 442-0455

Headquarters Superfund Community Relations Staff
(September 1983)

Daphne Gemmill
Community Relations Coordinator
Office of Emergency and Remedial Response
EPA Headquarters (WH-548D)
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2441 or (202) 382-2441

Anne Fenn
Assistant Community Relations Coordinator (Regions V - X)
Office of Emergency and Remedial Response
EPA Headquarters (WH-548D)
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2464 or (202) 382-2464

Allen Maples
Assistant Community Relations Coordinator (Regions I - IV)
Office of Emergency and Remedial Response
EPA Headquarters (WH-548D)
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2461 or (202) 382-2461

Michael Flaherty, Removal Actions Contact
Emergency Response Division (WH-548B)
Office of Emergency and Remedial Response
EPA Headquarters
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2196 or (202) 382-2196

Tony Diecidue, Remedial Actions Contact
Hazardous Site Control Division (WH-548E)
Office of Emergency and Remedial Response
EPA Headquarters
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2454 or (202) 382-2454

APPENDIX E

PROBLEM SITUATIONS

(reserved)

APPENDIX F

GLOSSARY OF TERMS AND ACRONYMS

This glossary presents brief descriptions of terms used in the community relations handbook. The terms are organized alphabetically by broad categories: community relations program; Superfund response actions; program documents and requirements; and program offices and officials. The acronyms that are applicable to program terms are listed at the end of the glossary. Detailed definitions of these terms are provided in this handbook.

COMMUNITY RELATIONS PROGRAM

Community Relations Program. The community relations program is a two-way communications program, designed to provide communities with accurate, understandable information about Superfund sites and proposed response actions, to elicit community concerns, and to provide communities with an opportunity to comment on proposed response actions.

Public Relations Program. A public relations program is an information program that exists primarily to provide information to the public about an agency and its programs. It differs from a community relations program in that it does not necessarily promote two-way communication.

The Superfund Response Program. The Superfund program is the response program established by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to respond to releases or threatened releases of hazardous substances, pollutants, or contaminants from vessels or facilities. (See CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.)

SUPERFUND RESPONSE ACTIONS

Response Actions. Superfund response actions are those removal or remedial actions undertaken in accordance with Section 104 of CERCLA. The three types of response actions that may be taken under CERCLA are described below.

Immediate Removals (IR). These are actions taken to prevent or mitigate immediate and significant risk of harm to human life or health or to the environment. They are subject to timing and monetary limitations. (See Section 300.65 of the NCP.)

Initial Remedial Measures (IRMs) These are actions that can be taken quickly to limit exposure or threat of exposure to a significant health or environmental hazard at sites where planning for remedial actions is underway. IRMs may fall into two categories: (1) relatively simple measures to stabilize or secure the site or reduce direct human exposure to hazardous substances; and (2) actions that are needed to remove serious threats of exposure while the full scale remedial investigation and feasibility study are underway. (See Section 300.68 of the NCP.)

Planned Removals (PR). These are actions that may be taken either when (1) the conditions for ending an immediate removal exist, yet a substantial cost savings can be realized by completing the action; or (2) action is warranted at a site that is neither on the National Priorities List nor meets the immediate removal criteria, but poses a risk to public health or the environment that requires action before the release can be added to the National Priorities List for remedial action. Planned removals are intended to respond to situations that require an expedited, but not immediate response. (See Section 300.67 of the NCP.)

Remedial Actions (RA). These are responses that are taken to releases on the National Priorities List that are consistent with a permanent remedy to prevent or mitigate the migration of a release of hazardous substances into the environment. The lead agency for the remedial response must select the most cost-effective remedy. (See Section 300.68 of the NCP.)

PROGRAM DOCUMENTS AND REQUIREMENTS

Action Memorandum (AM). This is the memorandum that contains a request for funding the Superfund action. The memorandum includes a description of the site and the problems posed by the release, references other relevant statutory provisions, and explains how the technical response is being coordinated with enforcement efforts.

Comment Period. This is the period of time provided to local officials and citizens to review the proposed Superfund remedial action. The community relations plan must specify that the community will have an opportunity to comment on the feasibility study prior to the selection of a site remedy. A minimum three-week comment period must be implemented for nonexpedited remedial actions. For any initial remedial measures (IRMs), the plan must also (1) address how the community will receive prior notification of any site action and (2) state that a minimum two-week comment period will be provided for any complex IRM recommended by a limited feasibility study.

Community Relations Plan (CRP). The CRP is the planning, management, and budget document that guides the community relations program at Superfund sites. A CRP must be developed for all

Superfund planned removal and remedial actions. In addition, a less detailed plan must be developed for immediate removals that are anticipated to last longer than 45 days. The plan contains: an assessment of citizen concern; a list of communications activities to be conducted at the site, a budget estimate, schedule, and workplan, and a list of technical and community relations staff responsible for site work.

Community Relations Profile. The profile--a short form CRP--is a brief analysis of the nature of citizen concern, the key site issues, and program objectives that must be prepared for immediate removal actions lasting longer than 5 days.

Cooperative Agreement (CA). The cooperative agreement is the agreement that outlines the responsibilities of the federal and state governments for removal or remedial actions at state-lead Superfund sites. (See "Guidance-Cooperative Agreement and Contracts with States under CERCLA (P.L. 96-510)," U.S. EPA, OERR, March 1982.

Feasibility Study (FS). The feasibility study is conducted to develop and analyze remedial alternatives, to recommend the appropriate cost-effective remedial action, to prepare an environmental assessment, and to develop a conceptual design for the recommended action.

Fourteen Point Document. This planned removal document, prepared by On-Scene Coordinators for EPA-lead actions, describes general site information, explains the threat presented by the site, and provides information regarding the proposed response action. (See the EPA Contracts Management Manual for the required contents of the document.)

National Contingency Plan (NCP). The NCP is the regulatory document that guides response actions taken pursuant to CERCLA and Section 311 of the Clean Water Act. (See the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR 300.)

National Priorities List (NPL). The NPL is a list of over 400 hazardous waste sites targeted for cleanup by federal and state governments under CERCLA. Sites on the list are candidates for remedial or enforcement action. Decisions on the type and extent of action to be taken at the site are made on a case by case basis according to guidelines specified in the NCP.

Quarterly Report. This is a brief summary of community relations activities for each Superfund response in the Region. Prepared by the Regional Superfund community relations coordinator, the report is submitted to Headquarters where it is used to analyze community relations programs and to identify potential communications problems at sites.

Remedial Investigation (RI). The remedial investigation is conducted to assess the problem at the site and to collect data necessary for its resolution. The study supports the analysis and selection of alternatives in the feasibility study.

Responsiveness Summary (RS). This is an in-house EPA report prepared by community relations staff at two points during remedial response: at the conclusion of the feasibility study and at the conclusion of the response action. It is also prepared at the conclusion of a planned removal. This report reviews public inquiries, the issues and concerns raised, and how EPA or the state responded to these issues and concerns. The report may be used to help document for the public record how EPA responded to key community concerns and issues.

State Superfund Contract. The state contract is the legal agreement that outlines federal and state government responsibilities at EPA-lead actions. (See "Guidance-Cooperative Agreements and Contracts with States under CERCLA (P.L. 96-510)," U.S. EPA, OERR, March 1982.)

Ten Point Document. Also known as the immediate removal request, this document is prepared by the On-Scene Coordinator to justify the request for Headquarters approval for immediate removal actions.

PROGRAM OFFICES AND OFFICIALS

Community Relations Coordinator (CRC). The CRC is the Regional Office staff person responsible for designing and implementing a site-specific community relations program. The CRC works closely with the site's On-Scene Coordinator to establish a site-specific communications program.

Emergency Response Division (ERD). This is the division within the Headquarters Office of Emergency and Remedial Response (OERR) that is responsible for conducting Superfund removal actions. ERD's staff reviews all community relations plans submitted for removal actions. ERD is responsible for preparing the Action Memorandum, the Fourteen and Ten Point Documents, and the planned removal cooperative agreement or state contract for Office Director and Assistant Administrator approval.

Hazardous Site Control Division (HSCD). This is the division within the Headquarters Office of Emergency and Remedial Response that is responsible for conducting Superfund remedial actions. HSCD's staff reviews all community relations plans submitted for remedial actions. HSCD is responsible for preparing the Action Memorandum, the remedial action cooperative agreement or state contract, and the statement of work for Office Director and Assistant Administrator approval.

The Office of Emergency and Remedial Response (OERR). This is the EPA office responsible for establishing Superfund policies, for implementing the Superfund Program, and for evaluating program effectiveness.

The Office of Policy and Program Management (OPPM). This is the office within OERR that is responsible for developing community relations policies, reviewing and approving community relations plans, tracking communications activities at sites, and conducting program evaluations and resource analysis.

The Regional Office of Public Affairs (OPA). Staff in the Regional Office of Public Affairs are responsible for helping to design and implement a community relations program at each site where Superfund monies have been obligated. The office works closely with the technical staff at the site and in the Regional Office in conducting community relations programs.

On-Scene Coordinator (OSC). This is the federal or state official that coordinates and directs the Superfund technical response at the site. The OSC works closely with the community relations staff to establish site-specific community relations programs.

COMMUNITY RELATIONS ACRONYMS

AM	Action Memorandum
CA	Cooperative Agreement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRC	Community Relations Coordinator
CRP	Community Relations Plan
ERD	Emergency Response Division
FS	Feasibility Study
HSCD	Hazardous Site Control Division
IR	Immediate Removal
IRM	Initial Remedial Measure
NCP	The National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
OERR	Office of Emergency and Remedial Response
OPA	Office of Public Affairs
OPPM	Office of Policy and Program Management
OSC	On-Scene Coordinator
PR	Planned Removal
RA	Remedial Action
RI	Remedial Investigation
RS	Responsiveness Summary

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